

**SUPPORTING STATEMENT  
ENVIRONMENTAL PROTECTION AGENCY**

**NESHAP for Aerospace Manufacturing and Rework Facilities (40 CFR Part 63, Subpart GG) (Renewal)**

**1. Identification of the Information Collection**

**1(a) Title of the Information Collection**

NESHAP for Aerospace Manufacturing and Rework Facilities (40 CFR Part 63, Subpart GG) (Renewal), EPA ICR Number 1687.12, OMB Control Number 2060-0314

**1(b) Short Characterization/Abstract**

The National Emission Standards for Hazardous Air Pollutants (NESHAP) for Aerospace Manufacturing and Rework Facilities (40 CFR Part 63, Subpart GG) were proposed on June 6, 1994; promulgated on September 1, 1995 and amended on both December 7, 2015 and August 3, 2016.<sup>1</sup> These regulations apply to existing and new aerospace manufacturing and rework facilities where the total hazardous air pollutants (HAP) emitted are greater than or equal to 10 tons per year of any combination of HAP, or where the total HAP emitted are greater than or equal to 25 tons per year of any combination of HAP. New facilities include those that commenced construction or reconstruction after the date of proposal. Operations covered include: cleaning, primer and top coat application, depainting, chemical milling maskant application, handling and storage of waste, and specialty coating operations. This information is being collected to assure compliance with 40 CFR Part 63, Subpart GG.

In general, all NESHAP standards require initial notifications, performance tests, and periodic reports by the owners/operators of the affected facilities. They are also required to maintain records of the occurrence and duration of any startup, shutdown, or malfunction in the operation of an affected facility, or any period during which the monitoring system is inoperative. These notifications, reports, and records are essential in determining compliance, and are required of all affected facilities subject to NESHAP.

Any owner/operator subject to the provisions of this part shall maintain a file containing these documents and retain the file for at least five years following the generation date of such maintenance reports and records. All reports are sent to either the delegated state or local authority. If there is no such delegated authority, the reports are sent directly to the U.S. Environmental Protection Agency (EPA) regional office.

Of the 144 total facilities, 36 facilities are owned by the Federal government and operated by federal contractors, while another 108 facilities are privately-owned, for-profit businesses, and hereafter referred to as the “Affected Public”. We assume that they will all respond to EPA

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<sup>1</sup> A direct final rule was published August 3, 2016 (81 FR 51114). These amendments provided a compliance date for sources subject to the requirements for handling and storage of waste in 40 CFR part 63, subpart GG, which was inadvertently excluded from the December 7, 2015 final risk and technology review. There are no changes to the recordkeeping and reporting burden from the direct final rule.

requirements. The “burden” to the Affected Public may be found at the end of this document in Tables 1a through 1e: Annual Respondent Burden and Cost – NESHAP for Aerospace Manufacturing and Rework Facilities (40 CFR Part 63, Subpart GG) (Renewal). The “burden” to facilities owned by the Federal Government is attributed entirely to work performed by Federal contractors and may be found at the end of this document in Tables 2a through 2e: Annual Burden and Cost for Federal Government-Owned Facilities – NESHAP for Aerospace Manufacturing and Rework Facilities (40 CFR Part 63, Subpart GG). The “burden” to the Federal Government is attributed entirely to work performed by Federal employees and may be found at the end of this document in Table 3: Average Annual EPA Burden and Cost – NESHAP for Aerospace Manufacturing and Rework Facilities (40 CFR Part 63, Subpart GG) (Renewal).

Over the next three years, an average of 144 facilities per year will be subject to these standards, and no additional respondents per year will become subject to these same standards. This estimate includes 108 private-owned facilities and 36 Federal government facilities. Each respondent may have one or more operations (e.g., cleaning, coating, depainting, or specialty coating operations) subject to these standards. Of the 144 existing sources currently covered by these standards, 144 facilities (36 Federal government-owned facilities and 108 privately-owned facilities) have cleaning and coating operations, 109 facilities (27 Federal government-owned facilities and 82 privately-owned facilities) have specialty coating operations, and 5 facilities (1 Federal government-owned facility and 4 privately-owned facilities) have depainting operations.

Based on our consultations with industry representatives, there are an average of 3 (rounded) affected operations at each plant site and that each plant site has only one respondent (i.e., the owner/operator of the plant site).

The Office of Management and Budget (OMB) approved the currently-active ICR without any “Terms of Clearance”.

## **2. Need for and Use of the Collection**

### **2(a) Need/Authority for the Collection**

The EPA is charged under Section 112 of the Clean Air Act, as amended, to establish standards of performance for each category or subcategory of major sources and area sources of hazardous air pollutants. These standards are applicable to new or existing sources of hazardous air pollutants and shall require the maximum degree of emission reduction. In addition, section 114(a) states that the Administrator may require any owner/operator subject to any requirement of this Act to:

- (A) Establish and maintain such records;
- (B) make such reports;
- (C) install, use, and maintain such monitoring equipment, and use such audit procedures, or methods;
- (D) sample such emissions (in accordance with such procedures or methods, at such locations, at such intervals, during such periods, and in such manner as the Administrator shall prescribe);
- (E) keep records on control

equipment parameters, production variables or other indirect data when direct monitoring of emissions is impractical; (F) submit compliance certifications in accordance with Section 114(a)(3); and (G) provide such other information as the Administrator may reasonably require.

In the Administrator's judgment, HAP emissions from aerospace manufacturing and rework facilities either cause or contribute to air pollution that may reasonably be anticipated to endanger public health and/or welfare. Therefore, the NESHAP were promulgated for this source category at 40 CFR Part 63, Subpart GG.

### **2(b) Practical Utility/Users of the Data**

The recordkeeping and reporting requirements in these standards ensure compliance with the applicable regulations which were promulgated in accordance with the Clean Air Act. The collected information is also used for targeting inspections and as evidence in legal proceedings.

Performance tests are required in order to determine an affected facility's initial capability to comply with the emission standards. Continuous emission monitors are used to ensure compliance with these standards at all times. During the performance test a record of the operating parameters under which compliance was achieved may be recorded and used to determine compliance in place of a continuous emission monitor.

The notifications required in these standards are used to inform the Agency or delegated authority when a source becomes subject to the requirements of the regulations. The reviewing authority may then inspect the source to check if the pollution control devices are properly installed and operated, leaks are being detected and repaired, and the standard is being met. The performance test may also be observed.

The required semiannual reports are used to determine periods of excess emissions, identify problems at the facility, verify operation/maintenance procedures, and for compliance determinations.

## **3. Non-duplication, Consultations, and Other Collection Criteria**

The requested recordkeeping and reporting are required under 40 CFR Part 63, Subpart GG.

### **3(a) Non-duplication**

If the subject standards have not been delegated, the information is sent directly to the appropriate EPA regional office. Otherwise, the information is sent directly to either the delegated state or local agency. If a state or local agency has adopted its own similar standards to implement the Federal standards, a copy of the report submitted to either the state or local agency can be sent to the Administrator in lieu of the report required by the Federal standards.

Therefore, duplication does not exist.

### **3(b) Public Notice Required Prior to ICR Submission to OMB**

An announcement of a public comment period for the renewal of this ICR was published in the *Federal Register* (84 FR 19777) on May 6, 2019. No comments were received on the burden published in the *Federal Register* for this renewal.

### **3(c) Consultations**

The Agency has consulted industry experts and internal data sources to project the number of affected facilities and industry growth over the next three years. The primary source of information as reported by industry, in compliance with the recordkeeping and reporting provisions in the standard, is the Integrated Compliance Information System (ICIS). ICIS is EPA's database for the collection, maintenance, and retrieval of compliance data for industrial and government-owned facilities. The growth rate for the industry is based on our consultations with the Agency's internal industry experts. Approximately 144 respondents will be subject to these standards over the three-year period covered by this ICR.

Industry trade associations and other interested parties were provided an opportunity to comment on the burden associated with these standards as they were being developed and these same standards have been reviewed previously to determine the minimum information needed for compliance purposes. In developing this ICR, we contacted both the Aerospace Manufacturing Technologies, at (360) 435-1119, and the Aerospace Industries Association, at (703) 358-1000.

It is our policy to respond after a thorough review of comments received since the last ICR renewal, as well as for those submitted in response to the first *Federal Register* notice. In this case, no comments were received.

### **3(d) Effects of Less-Frequent Collection**

Less-frequent information collection would decrease the margin of assurance that facilities are continuing to meet the standards. Requirements for information gathering and recordkeeping are useful techniques to ensure that good operation and maintenance practices are applied and emission limitations are met. If the information required by these standards was collected less frequently, the proper operation and maintenance of control equipment and the possibility of detecting violations would be less likely.

### **3(e) General Guidelines**

These reporting or recordkeeping requirements do not violate any of the regulations promulgated by OMB under 5 CFR Part 1320, Section 1320.5.

These standards require the respondents to maintain all records, including reports and notifications for at least five years. This is consistent with the General Provisions as applied to these standards. EPA believes that the five-year records retention requirement is consistent with the Part 70 permit program and the five-year statute of limitations on which the permit program is based. The retention of records for five years allows EPA to establish the compliance history of a source, any pattern of non-compliance and to determine the appropriate level of enforcement action. EPA has found that the most flagrant violators have violations extending beyond five years. In addition, EPA would be prevented from pursuing the violators due to the destruction or nonexistence of essential records.

### **3(f) Confidentiality**

Any information submitted to the Agency for which a claim of confidentiality is made will be safeguarded according to the Agency policies set forth in Title 40, chapter 1, part 2, subpart B - Confidentiality of Business Information (CBI) (see 40 CFR 2; 41 FR 36902, September 1, 1976; amended by 43 FR 40000, September 8, 1978; 43 FR 42251, September 20, 1978; 44 FR 17674, March 23, 1979).

### **3(g) Sensitive Questions**

The reporting or recordkeeping requirements in the standard do not include sensitive questions.

## **4. The Respondents and the Information Requested**

### **4(a) Respondents/SIC Codes**

The respondents to the recordkeeping and reporting requirements are aerospace manufacturing and rework facilities. The United States Standard Industrial Classification (SIC) codes for the respondents affected by the standards and the corresponding North American Industry Classification System (NAICS) codes for the respondents can be found in the table below.

<b>40 CFR Part 63, Subpart GG</b>	<b>SIC Codes</b>	<b>NAICS Codes</b>
Aircraft Manufacturing	3721, 3728	336411
Aircraft Engine and Engine Parts Manufacturing	3724	336412
Other Aircraft Parts and Auxiliary Equipment Manufacturing	3728	336413
Fluid Power Valve and Hose Fitting Manufacturing	3728	332912
Guided Missile and Space Vehicle Manufacturing	3761	336414
Guided Missile and Space Vehicle Propulsion Unit and Propulsion Unit Parts Manufacturing	3764	336415

Other Guided Missile and Space Vehicle Parts and Auxiliary Equipment Manufacturing	3769	336419
Other Airport Operations	4581	488119

#### **4(b) Information Requested**

##### **(i) Data Items**

In this ICR, all the data that are recorded or reported is required by the NESHAP for Aerospace Manufacturing and Rework Facilities (40 CFR Part 63, Subpart GG).

A source must make the following reports:

<b>Notifications/Reports</b>	
Notification of construction and modification	§§63.743(a)(2-3), §63.753(a), §63.5(d)
Initial notification for existing sources	§63.9(b)(2), §63.753(a)(2)
Notification of performance test and results	§63.7(b), §63.7(g)(1), §63.9(e), §63.10(d)(2), §63.753(a), §63.753(f)
Notification and report of physical and operational changes	§63.5(b)(6), §63.743(a)(2), §63.753(a)
Notification and report of production capacity	§63.9(b)(2), §63.753(a)
Notification and report of compliance status	§63.9(h), §63.753(a)
Notification and report for waiver applications	§63.7(h)(3), §63.753(a)
Semiannual report, including report of periods of noncompliance	§63.753(a)(5), §63.753(b), §63.753(c)(1), §63.753(d)(1) and (3), §63.753(e)
Annual report	§63.753(c)(2), §63.753(d)(2)

A source must keep the following records:

<b>Recordkeeping</b>	
Records of daily and monthly inspections	§63.10(b)(2), §63.743(a)(3), §63.752(a)
Records of failure to meet an emission standard, and corrective actions taken	§§63.752(a)(1)-(3)
Emission testing	§63.10(b)(2), §63.752(a)

<b>Recordkeeping</b>	
Facility operation and maintenance including construction and modification	§63.5(b), §§63.743(a)(2)-(3), §63.752
Cleaning solvents, all information records	§63.752(b)(1)
Cleaning solvents, approved composition and vapor pressure, solvent usage records	§63.752(b)(2)
Cleaning solvents, non-approved composition, approved vapor pressure, solvent usage records	§63.752(b)(3)
Cleaning solvents, usage log for exempt processes	§63.752(b)(4)
Cleaning solvents, log of spray gun cleaner leaks	§63.752(b)(5)
Primers/topcoats/maskants/specialty coatings: Records using compliant coatings without averaging	§§63.752(c)(1-3), §63.752(f)(1)
Primers/topcoats/maskants/specialty coatings: Records using averaging	§63.752(c)(1), §63.752(c)(4), §63.752(f)(2)
Primers/topcoats/maskants/specialty coatings: Records using control devices	§63.752(c)(1), §§63.752(c)(5-6), §63.752(d), §§63.752(f)(3)-(4)
Chemical strippers, records and parts removed	§63.752(e)(1), §63.752(e)(4)
Chemical strippers, records using control devices	§63.752(e)(2), §63.752(e)(3)
Depainting equipment malfunction log	§63.752(e)(5)
Annual exempt chemical stripper usage log and reworked airplane log for spot stripping and decal removal	§63.752(e)(6)
Depainting control device maintenance log	§63.752(e)(7)
5-years retention of records	§63.10(b)(1), §63.752(a)

### Electronic Reporting

Some of the respondents are using monitoring equipment that automatically records parameter data. Although personnel at the affected facility must still evaluate the data, internal automation has significantly reduced the burden associated with monitoring and recordkeeping at a plant site.

The rule requires that all respondents submit electronic copies of certain required performance test reports through CDX using the EPA's Compliance and Emissions Data Reporting Interface (CEDRI). The CDX is the EPA's portal for submittal of electronic data using the EPA-provided ERT to generate electronic reports of performance tests and evaluations. The ERT generates an electronic report package that will be submitted using the CEDRI. The submitted report package will be stored in the CDX archive (the official copy of record) and the EPA's public database called WebFIRE.

**(ii) Respondent Activities**

<b>Respondent Activities</b>
Familiarization with the regulatory requirements.
Install, calibrate, maintain, and operate CMS for opacity, or for pressure drop and liquid supply pressure for control device.
Perform initial performance test, Reference Method 1 or 1A, 2, 2B, 2C, or 2D, 3, 4, 18, 24, 25A, 40, 301, 311, or 319 tests, and repeat performance tests if necessary.
Write the notifications and reports listed above.
Enter information required to be recorded above.
Submit the required reports developing, acquiring, installing, and utilizing technology and systems for collecting, validating, and verifying information.
Develop, acquire, install, and utilize technology and systems for processing and maintaining information.
Develop, acquire, install, and utilize technology and systems for disclosing and providing information.
Train personnel to be able to respond to a collection of information.
Transmit, or otherwise disclose the information.

**5. The Information Collected: Agency Activities, Collection Methodology, and Information Management****5(a) Agency Activities**

EPA conducts the following activities in connection with the acquisition, analysis, storage, and distribution of the required information:

<b>Agency Activities</b>
Review notifications and reports, including performance test reports, and excess emissions reports, required to be submitted by industry.
Audit facility records.
Input, analyze, and maintain data in the Enforcement and Compliance History Online (ECHO) and ICIS.



### **5(b) Collection Methodology and Management**

Following notification of startup, the reviewing authority could inspect the source to determine whether the pollution control devices are properly installed and operated. Performance test reports are used by the Agency to discern a source's initial capability to comply with the emission standards and note the operating conditions under which compliance was achieved. Data and records maintained by the respondents are tabulated and published for use in compliance and enforcement programs. The semiannual reports are used for problem identification, as a check on source operation and maintenance, and for compliance determinations.

Information contained in the reports is reported by state and local governments in the ICIS Air database, which is operated and maintained by EPA's Office of Compliance. ICIS is EPA's database for the collection, maintenance, and retrieval of compliance data for industrial and government-owned facilities. EPA uses ICIS for tracking air pollution compliance and enforcement by local and state regulatory agencies, EPA regional offices and EPA headquarters. EPA and its delegated Authorities can edit, store, retrieve and analyze the data.

The records required by this regulation must be retained by the owner/operator for five years.

### **5(c) Small Entity Flexibility**

There are no small entities (i.e., small businesses) affected by this regulation.

### **5(d) Collection Schedule**

The specific frequency for each information collection activity within this request is shown at the end of this document in Tables 1a through 1d: Annual Respondent Burden and Cost – NESHAP for Aerospace Manufacturing and Rework Facilities (40 CFR Part 63, Subpart GG) (Renewal) and Tables 2a through 2d: Annual Burden and Cost for Federal Government-Owned Facilities – NESHAP for Aerospace Manufacturing and Rework Facilities (40 CFR Part 63, Subpart GG) (Renewal).

## **6. Estimating the Burden and Cost of the Collection**

Tables 1a through 1d documents the computation of individual burdens for the recordkeeping and reporting requirements applicable to the privately-owned facilities in the industry for the subpart included in this ICR. Tables 2a through 2d documents the computation of individual burdens for the recordkeeping and reporting requirements applicable to the Federal government-owned facilities in the industry for the subpart included in this ICR. The individual burdens are expressed under standardized headings believed to be consistent with the concept of 'Burden' under the Paperwork Reduction Act. Where appropriate, specific tasks and major assumptions have been identified. Responses to this information collection are mandatory.

The Agency may neither conduct nor sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB Control Number.

### **6(a) Estimating Respondent Burden**

The average annual burden to industry over the next three years from these recordkeeping and reporting requirements is estimated to be 115,000 hours for privately-owned facilities (Total Labor Hours from Tables 1a through 1d, and summarized in Table 1e, at the end of this document). For government-owned facilities, the average annual burden is estimated to be 39,200 hours (Total Labor Hours from Tables 2a through 2d, and summarized in Table 2e, at the end of this document). These hours are based on Agency studies and background documents from the development of the regulation, Agency knowledge and experience with the NESHAP program, the previously-approved ICR, and any comments received.

### **6(b) Estimating Respondent Costs**

#### **(i) Estimating Labor Costs**

This ICR uses the following labor rates:

Managerial	\$141.06 (\$67.17+ 110%)
Technical	\$120.27 (\$57.27 + 110%)
Clerical	\$58.67 (\$27.94 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, June 2019, “Table 2. Civilian Workers, by occupational and industry group.” The rates are from column 1, “Total compensation.” The rates have been increased by 110 percent to account for the benefit packages available to those employed by private industry.

#### **(ii) Estimating Capital/Startup and Operation and Maintenance Costs**

The type of industry costs associated with the information collection activities in the subject standards are both labor costs which are addressed elsewhere in this ICR and the costs associated with continuous monitoring. The capital/startup costs are one-time costs when a facility becomes subject to these regulations. The annual operation and maintenance costs are the ongoing costs to maintain the monitors and other costs such as photocopying and postage.

#### **(iii) Capital/Startup vs. Operation and Maintenance (O&M) Costs**

<b>Capital/Startup vs. Operation and Maintenance (O&amp;M) Costs</b>						
(A) Continuous	(B) Capital/Startup	(C) Number of	(D) Total	(E) Annual O&M	(F) Number of	(G) Total O&M,

<b>Capital/Startup vs. Operation and Maintenance (O&amp;M) Costs</b>						
Monitoring Device	Cost for One Respondent	New Respondents	Capital/Startup Cost, (B X C)	Costs for One Respondent	Respondents with O&M	(E X F)
<b>Privately-Owned Facilities</b>						
CEM	\$14,000	0	\$0	\$1,000	108	\$108,000
Total			\$0			\$108,000
<b>Federal Government-Owned Facilities</b>						
CEM	\$14,000	0	\$0	\$1,000	36	\$36,000
Total			\$0			\$36,000

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

The total capital/startup costs for this ICR are \$0. This is the total of column D in the above table.

The total operation and maintenance (O&M) costs for privately-owned facilities in this ICR are \$108,000. The total operation and maintenance (O&M) costs for Federal government-owned facilities in this ICR are \$36,000. These totals are in column G.

Once again, the average annual cost for capital/startup and operation and maintenance costs to privately-owned facilities over the next three years of the ICR is estimated to be \$108,000. Also, the average annual cost for capital/startup and operation and maintenance costs to Federal government-owned facilities over the next three years of the ICR is estimated to be \$36,000. These are recordkeeping costs.

### **6(c) Estimating Agency Burden and Cost**

The only costs to the Agency are those costs associated with analysis of the reported information. EPA's overall compliance and enforcement program includes activities such as the examination of records maintained by the respondents, periodic inspection of sources of emissions, and the publication and distribution of collected information. The average annual Agency cost during the three years of the ICR is estimated to be \$210,000.

This cost is based on the average hourly labor rate as follows:

Managerial	\$66.62 (GS-13, Step 5, \$41.64 + 60%)
Technical	\$49.44 (GS-12, Step 1, \$30.90 + 60%)
Clerical	\$26.75 (GS-6, Step 3, \$16.72 + 60%)

These rates are from the Office of Personnel Management (OPM), 2019 General Schedule, which excludes locality rates of pay. The rates have been increased by 60 percent to account for the benefit packages available to government employees. Details upon which this estimate is based appear at the end of this document in Tables 2a through 2d: Annual Burden and Cost for Federal Government-Owned Facilities – NESHAP for Aerospace Manufacturing and Rework Facilities (40 CFR Part 63, Subpart GG) (Renewal) and in Table 3: Average Annual

EPA Burden and Cost – NESHAP for Aerospace Manufacturing and Rework Facilities (40 CFR Part 63, Subpart GG) (Renewal).

### 6(d) Estimating the Respondent Universe and Total Burden and Costs

Based on our research for this ICR, on average over the next three years, approximately 144 existing facilities will be subject to these standards. It is estimated that no additional facilities per year will become subject to these same standards. Thirty-six of the facilities in the United States are operated by the Federal government and 108 facilities are privately-owned, for-profit businesses. Thus, the overall average number of respondents, as shown in the table below, is 144 per year. Of the 144 existing sources currently covered by these standards, 144 facilities (36 Federal government-owned facilities and 108 privately-owned facilities) have cleaning and coating operations, 109 facilities (27 Federal government-owned facilities and 82 privately-owned facilities) have specialty coating operations, and 5 facilities (1 Federal government-owned facility and 4 privately-owned facilities) have depainting operations.

The number of respondents is calculated using the following table that addresses the three years covered by this ICR:

<b>Number of Respondents</b>					
	Respondents That Submit Reports		Respondents That Do Not Submit Any Reports		
Year	(A) Number of New Respondents <sup>a</sup>	(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	(E) Number of Respondents (E=A+B+C-D)
1	0	144	0	0	144
2	0	144	0	0	144
3	0	144	0	0	144
Average	0	144	0	0	144

<sup>a</sup> New respondents include sources with constructed, reconstructed and modified affected facilities.

Column D is subtracted to avoid double-counting respondents. As shown above, the average Number of Respondents over the three-year period of this ICR is 144.

The total number of annual responses per year is calculated using the following table:

<b>Total Annual Responses</b>				
(A) Information Collection Activity	(B) Number of Respondents	(C) Number of Responses	(D) Number of Existing Respondents That	(E) Total Annual Responses

<b>Total Annual Responses</b>				
			Keep Records But Do Not Submit Reports	E=(BxC)+D
<b>Privately-owned facilities</b>				
Notification of construction/reconstruction	0	1	0	0
Notification of physical and operational changes	10	1	0	10
Notification of actual startup	0	1	0	0
Notification of change in production capacity	0	1	0	0
Compliance status information report	220	1	0	220
Waiver application	22	1	0	22
Semiannual report – including report of periods of noncompliance	175	2	0	350
Subtotal				602
<b>Federal government-owned facilities</b>				
Notification of construction/reconstruction	0	1	0	0
Notification of physical and operational changes	4	1	0	4
Notification of actual startup	0	1	0	0
Notification of change in production capacity	0	1	0	0
Compliance status information report	73	1	0	73
Waiver application	8	1	0	8
Semiannual report – including report of periods of noncompliance	59	2	0	118
<i>Subtotal</i>				203
			<b>Total</b>	805

The number of Total Annual Responses is 805.

For privately-owned facilities, the total annual labor costs are \$13,400,000 (rounded). Details regarding these estimates may be found at the end of this document in Tables 1a through 1d: Annual Respondent Burden and Cost – NESHAP for Aerospace Manufacturing and Rework Facilities (40 CFR Part 63, Subpart GG) (Renewal). A summary of the total respondent labor costs can be found at the end of this document in Table 1e: Summary of Annual Respondent Burden and Cost for Tables 1a, 1b, 1c, & 1d – NESHAP for Aerospace Manufacturing and Rework Facilities (40 CFR Part 63, Subpart GG) (Renewal).

For the Federal government-owned facilities, the total annual labor costs are \$1,920,000. Details regarding these estimates may be found at the end of this document in Tables 2a through 2d: Annual Burden and Cost for Federal Government-Owned Facilities – NESHAP for Aero-

space Manufacturing and Rework Facilities (40 CFR Part 63, Subpart GG) (Renewal). A summary of the total respondent labor costs can be found at the end of this document in Table 2e: Summary of Annual Respondent Burden and Cost for Tables 2a, 2b, 2c, & 2d – NESHAP for Aerospace Manufacturing and Rework Facilities (40 CFR Part 63, Subpart GG) (Renewal).

### **6(e) Bottom Line Burden Hours and Cost Tables**

The detailed bottom line burden hours and cost calculations for the respondents and the Agency are shown in Tables 1a through 1d, 2a through 2d, and 3 at the end of this document, respectively, and summarized below.

#### **(i) Respondent Tally**

The total annual labor hours are 115,000 hours for privately-owned facilities. Details regarding these estimates may be found at the end of this document in Tables 1a through 1d: Annual Respondent Burden and Cost – NESHAP for Aerospace Manufacturing and Rework Facilities (40 CFR Part 63, Subpart GG) (Renewal). A summary of the total respondent labor hours can be found at the end of this document in Table 1e: Summary of Annual Respondent Burden and Cost for Tables 1a, 1b, 1c, & 1d – NESHAP for Aerospace Manufacturing and Rework Facilities (40 CFR Part 63, Subpart GG) (Renewal).

The total annual labor hours are 39,200 for Federal government-owned facilities. Details regarding these estimates may be found at the end of this document in Tables 2a through 2d: Annual Burden and Cost for Federal Government-Owned Facilities – NESHAP for Aerospace Manufacturing and Rework Facilities (40 CFR Part 63, Subpart GG) (Renewal). A summary of the total respondent labor hours can be found in Table 2e: Summary of Annual Respondent Burden and Cost for Tables 2a, 2b, 2c, & 2d – NESHAP for Aerospace Manufacturing and Rework Facilities (40 CFR Part 63, Subpart GG) (Renewal).

We assume that burdens for managerial tasks take 5% of the time required for technical tasks because the typical tasks for managers are to review and approve reports. Clerical burdens are assumed to take 10% of the time required for technical tasks because the typical duties of clerical staff are to proofread the reports, make copies, and maintain records.

Furthermore, the annual public reporting and recordkeeping burden for this collection of information is estimated to average 191 hours per response for privately-owned facilities and 193 hours per response for Federal government-owned facilities.

The total annual capital/startup and O&M costs to the regulated entity are \$108,000 for privately-owned facilities and \$36,000 for Federal government-owned facilities. The cost calculations are detailed in Section 6(b)(iii), Capital/Startup vs. Operation and Maintenance (O&M) Costs.

#### **(ii) The Agency Tally**

The average annual Agency burden and cost over next three years is estimated to be 4,360 labor hours at a cost of \$210,000; see Table 3 at the end of this document: Average Annual EPA Burden and Cost – NESHAP for Aerospace Manufacturing and Rework Facilities (40 CFR Part 63, Subpart GG) (Renewal).

We assume that burdens for managerial tasks take 5% of the time required for technical tasks because the typical tasks for managers are to review and approve reports. Clerical burdens are assumed to take 10% of the time required for technical tasks because the typical duties of clerical staff are to proofread the reports, make copies and maintain records.

### **6(f) Reasons for Change in Burden**

There is no change in the burden hours or cost in this ICR compared to the hours and costs described in supporting statement for the previous ICR. This is due to two considerations. First, the regulations have had no significant changes over the past three years and are not anticipated to change over the next three years. Secondly, the growth rate for the industry is very low, negative or non-existent, so there is no significant change in the overall burden. Since there are no changes in the regulatory recordkeeping and reporting requirements and there is no significant industry growth, the labor hours and cost figures in the previous ICR are used in this ICR and there is no change in burden to industry. There is an increase in burden hours and costs when compared to the numbers previously entered in ROCIS. This is due to an administrative error in the previous ICR where the hours and costs for Federal facilities run by contractors were accounted for only in the supporting statement and inadvertently omitted of the ROCIS entry.

### **6(g) Burden Statement**

The annual public reporting and recordkeeping burden for this collection of in reporting and recordkeeping burden formation is estimated to average 191 hours per response for privately-owned facilities, whereas the reporting and recordkeeping burden is 193 hours per response for Federal government-owned facilities. ‘Burden’ means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to a collection of information; search data sources; complete and review the collection of information; and transmit or otherwise disclose the information.

An agency may neither conduct nor sponsor, and a person is not required to respond to, a collection of information unless it displays a valid OMB Control Number. The OMB Control Numbers for EPA regulations are listed at 40 CFR Part 9 and 48 CFR Chapter 15.

To comment on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the

use of automated collection techniques, EPA has established a public docket for this ICR under Docket ID Number EPA-HQ-OECA-2013-0335. An electronic version of the public docket is available at <http://www.regulations.gov/>, which may be used to obtain a copy of the draft collection of information, submit or view public comments, access the index listing of the contents of the docket, and to access those documents in the public docket that are available electronically. When in the system, select “search,” then key in the docket ID number identified in this document. The documents are also available for public viewing at the Enforcement and Compliance Docket and Information Center in the EPA Docket Center (EPA/DC), WJC West, Room 3334, 1301 Constitution Ave., NW, Washington, DC. The EPA Docket Center Public Reading Room is open from 8:30 a.m. to 4:30 p.m., Monday through Friday, excluding legal holidays. The telephone number for the Reading Room is (202) 566-1744, and the telephone number for the docket center is (202) 566-1752. Also, you can send comments to the Office of Information and Regulatory Affairs, Office of Management and Budget, 725 17th Street, NW, Washington, DC 20503, Attention: Desk Officer for EPA. Please include the EPA Docket ID Number EPA-HQ-OECA-2013-0335 and OMB Control Number 2060-0314 in any correspondence.

### **Part B of the Supporting Statement**

This part is not applicable because no statistical methods were used in collecting this information.



**Table 1a: Annual Respondent Burden and Cost – NESHAP for Aerospace Manufacturing and Rework Facilities (40 CFR Part 63, Subpart GG) (Renewal) (Cleaning Operations)**

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>	(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>
1. Applications	N/A							
2. Surveys and studies	N/A							
3. Reporting requirements								
A. Familiarize with regulatory requirements <sup>c</sup>	1	1	1	108	108	5.4	10.8	\$14,384.52
B. Required activities	N/A							
C. Create information	See 3E & 4C							
D. Gather existing information	See 3E & 4C							
E. Write report								
Notification of construction/reconstruction	2	1	2	0	0	0	0	\$0
Notification of physical and operational changes <sup>d</sup>	8	1	8	5	40	2	4	\$5,327.60
Notification of actual startup	2	1	2	0	0	0	0	\$0
Notification of change in production capacity	2	1	2	0	0	0	0	\$0
Compliance status information report <sup>e</sup>	20	1	20	108	2,160	108	216	\$287,690.40
Waiver application <sup>f</sup>	4	1	4	11	44	2.2	4.4	\$5,860.36
Preparation of site-specific test plan	N/A							
Notification of initial performance test	N/A							
Report of initial test	N/A							

Semiannual report – including report of periods of noncompliance <sup>g</sup>	12	2	24	86	2,064	103.2	206.4	\$274,904.16
<b>Subtotal for Reporting Requirements</b>					<b>5,078</b>			<b>\$588,167</b>
4. Recordkeeping requirements								
A. Familiarize with regulatory requirements	See 3A							
B. Plan activities	4	1	4	108	432	21.6	43.2	\$57,538.08
C. Implement activities								
Solvent information records	4	2	8	108	864	43.2	86.4	\$115,076.16
Approved composition solvent records (demonstrating compliance) <sup>h</sup>	4	1	4	32	128	6.4	12.8	\$17,048.32
Non-approved list solvent usage records <sup>i</sup>	1	12	12	97	1,164	58.2	116.4	\$155,033.16
Solvent usage log for exempt processes <sup>j</sup>	0.5	12	6	76	456	22.8	45.6	\$60,734.64
Log of gun cleaner leaks <sup>k</sup>	1	6	6	22	132	6.6	13.2	\$17,581.08
D. Develop record system <sup>l</sup>	20	1	20	108	2,160	108	216	\$287,690.40
E. Time to enter information								
Records of all measurements and information required by standard	See 4C							
F. Time to train personnel <sup>m</sup>	4	50	200	108	21,600	1,080	2,160	\$2,876,904.00
G. Time for audits	20	1	20	108	2,160	108	216	\$287,690.40
<b>Subtotal for Recordkeeping Requirements</b>					<b>33,460</b>			<b>\$3,875,296</b>
<b>TOTAL LABOR BURDEN AND COST (rounded)<sup>n</sup></b>					<b>38,500</b>			<b>\$4,460,000</b>
<b>TOTAL CAPITAL AND O&amp;M COST (rounded)<sup>n,o</sup></b>								<b>\$108,000</b>
<b>GRAND TOTAL (rounded)<sup>n</sup></b>								<b>\$4,570,000</b>

**Assumptions:**

<sup>a</sup> We have assumed that the average number of respondents that will be subject to this rule will be 144. Of the 144 respondents, 108 are privately-owned and 36

are Federally-owned. There will be no new additional sources during the next three years of this ICR.

<sup>b</sup> This ICR uses the following labor rates: \$141.06 per hour for Executive, Administrative, and Managerial labor; \$120.27 per hour for Technical labor, and \$58.67 per hour for Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, June 2019, "Table 2. Civilian Workers, by Occupational and Industry group." The rates are from column 1, "Total Compensation." The rates have been increased by 110 percent to account for the benefit packages available to those employed by private industry.

<sup>c</sup> We have assumed all existing sources will have to re-familiarize with regulatory requirements each year.

<sup>d</sup> We have assumed that 5 percent of the total existing facilities will write the physical and operational changes report ( $108 \times 5\% = 5.4$ , rounded to 5).

<sup>e</sup> We have assumed that each respondent will write compliance status information report.

<sup>f</sup> We have assumed that 10 percent of the respondents will request a waiver ( $108 \times 10\% = 10.8$ , rounded to 11).

<sup>g</sup> We have assumed that 80 percent of facilities will have excess emissions or will change their process in some way and will submit semiannual reports ( $108 \times 80\% = 86.4$ , rounded to 86).

<sup>h</sup> We have assumed that 30 percent of facilities will use the approved list of solvents ( $108 \times 30\% = 32.4$ , rounded to 32).

<sup>i</sup> We have assumed that 90 percent of facilities will use some solvents not on the approved list ( $108 \times 90\% = 97.2$ , rounded to 97).

<sup>j</sup> We have assumed that 70 percent of facilities will use some solvents for exempt processes ( $108 \times 70\% = 75.6$ , rounded to 76).

<sup>k</sup> We have assumed that 20 percent of facilities will have a leak in their enclosed gun cleaner ( $108 \times 20\% = 21.6$ , rounded to 22).

<sup>l</sup> We have assumed that all facilities will need to develop a record keeping system.

<sup>m</sup> We have assumed that each respondent will take 4 hours 50 times per year to complete task.

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

<sup>o</sup> The total capital and O&M cost in this table are the total for cleaning, coating, depainting and specialty coating operations combined (see Tables 1b-1d for burden associated with these operations).

**Table 1b: Annual Respondent Burden and Cost – NESHAP for Aerospace Manufacturing and Rework Facilities (40 CFR Part 63, Subpart GG) (Renewal) (Coating Operations)**

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>	(E) Technical person- hours per year (E=CxD)	(F) Management person hours per year (F=E <sub>x</sub> 0.05)	(G) Clerical person hours per year (G=E <sub>x</sub> 0.1)	(H) Total Cost Per Year <sup>b</sup>
1. Applications	N/A							
2. Surveys and studies	N/A							
3. Reporting requirements								
A. Familiarize with regulatory requirements <sup>c</sup>	1	1	1	108	108	5.4	10.8	\$14,384.52
B. Required activities								
Initial performance tests <sup>d</sup>	280	1	280	3	840	42	84	\$111,879.60
Repeat performance test <sup>e</sup>	280	1	280	1	280	14	28	\$37,293.20
C. Create information	See 3E & 4C							
D. Gather existing information	See 3E & 4C							
E. Write report								
Notification of construction/reconstruction	2	1	2	0	0	0	0	\$0
Notification of physical and operational changes <sup>f</sup>	8	1	8	5	40	2	4	\$5,327.60
Notification of actual startup	2	1	2	0	0	0	0	\$0
Notification of change in production capacity	2	1	2	0	0	0	0	\$0
Compliance status information report <sup>k</sup>	10	1	10	108	1,080	54	108	\$143,845.20
Waiver application <sup>g</sup>	4	1	4	11	44	2.2	4.4	\$5,860.36
Preparation of site-specific test	See 3B							



<b>COST (rounded) <sup>l,m</sup></b>								
<b>GRAND TOTAL (rounded) <sup>l</sup></b>								<b>\$8,300,000</b>

**Assumptions:**

- <sup>a</sup> We have assumed that the average number of respondents that will be subject to this rule will be 144. Of the 144 respondents, 108 are privately-owned and 36 are Federally-owned. There will be no new additional sources during the next three years of this ICR.
- <sup>b</sup> This ICR uses the following labor rates: \$141.06 per hour for Executive, Administrative, and Managerial labor; \$120.27 per hour for Technical labor, and \$58.67 per hour for Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, June 2019, “Table 2. Civilian Workers, by Occupational and Industry group.” The rates are from column 1, “Total Compensation.” The rates have been increased by 110 percent to account for the benefit packages available to those employed by private industry.
- <sup>c</sup> We have assumed all existing sources will have to re-familiarize with regulatory requirements each year.
- <sup>d</sup> We assume that 3 privately-owned facilities will use add-on control equipment for maskant application.
- <sup>e</sup> We have assumed that 20% of privately-owned facility with add-on control equipment will repeat performance test ( $3 \times 20\% = 0.6$ , rounded to 1).
- <sup>f</sup> We have assumed that 5 percent of the total existing facilities will write the physical and operational changes report ( $108 \times 5\% = 5.4$ , rounded to 5).
- <sup>g</sup> We have assumed that 10 percent of the respondents will request a waiver ( $108 \times 10\% = 10.8$ , rounded to 11).
- <sup>h</sup> We have assumed that 80 percent of facilities will have excess emissions or will change their process in some way and will submit semiannual reports ( $108 \times 80\% = 86.4$ , rounded to 86).
- <sup>i</sup> The final rule required monthly records. Daily averaging was included in the cost analysis because 90 percent of the industry is located in non-attainment areas and will be required to use daily averaging by the permitting agency.
- <sup>j</sup> We have assumed that all facilities will need to develop a record keeping system.
- <sup>k</sup> We have assumed that each respondent will write compliance status information report.
- <sup>l</sup> Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.
- <sup>m</sup> The capital and O&M cost for this operation has be included in the table for cleaning operations (see Table 1a).

**Table 1c: Annual Respondent Burden and Cost – NESHAP for Aerospace Manufacturing and Rework Facilities (40 CFR Part 63, Subpart GG) (Renewal) (Depainting Operations)**

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>	(E) Technical person- hours per year (E=CxD)	(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>
1. Applications	N/A							
2. Surveys and studies	N/A							
3. Reporting requirements								
A. Familiarize with regulatory requirements <sup>c</sup>	1	1	1	4	4	0.2	0.4	\$532.76
B. Required activities	N/A							
Initial performance tests	280	1	280	0	0	0	0	\$0
Repeat performance test	280	1	280	0	0	0	0	\$0
C. Create information	See 3E & 4C							
D. Gather existing information	See 3E & 4C							
E. Write report								
Notification of construction/reconstruction	2	1	2	0	0	0	0	\$0
Notification of physical and operational changes	8	1	8	0	0	0	0	\$0
Notification of actual startup	2	1	2	0	0	0	0	\$0
Notification of change in production capacity	2	1	2	0	0	0	0	\$0
Compliance status information report <sup>g</sup>	10	1	10	4	40	2	4	\$5,327.60
Waiver application	4	1	4	0	0	0	0	\$0
Preparation of site-specific test plan	N/A							
Notification of initial	2	1	2	0	0	0	0	\$0





<b>COST (rounded)</b> <sup>h,i</sup>								
<b>GRAND TOTAL (rounded)</b> <sup>h</sup>								<b>\$89,800</b>

**Assumptions:**

<sup>a</sup> We have assumed that the average number of respondents that will be subject to this rule will be 144. Of the 144 respondents, 108 are privately-owned and 36 are Federally-owned. There will be no new additional sources during the next three years of this ICR. Of the 144 facilities we assume 4 privately-owned facilities and 1 Federally-owned facility will have depainting operations.

<sup>b</sup> This ICR uses the following labor rates: \$141.06 per hour for Executive, Administrative, and Managerial labor; \$120.27 per hour for Technical labor, and \$58.67 per hour for Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, June 2019, "Table 2. Civilian Workers, by Occupational and Industry group." The rates are from column 1, "Total Compensation." The rates have been increased by 110 percent to account for the benefit packages available to those employed by private industry.

<sup>c</sup> We have assumed all existing sources will have to re-familiarize with regulatory requirements each year.

<sup>d</sup> We have assumed that 80 percent of facilities will have excess emissions or will change their process in some way and will submit semiannual reports (4 x 80% = 3.2, rounded to 3).

<sup>e</sup> We have assumed that 1 percent of facilities will use HAP containing chemical strippers as the primary stripping techniques, 29 percent will use media blasting equipment, 70 percent will use non-HAP chemical strippers, and 100 percent of facilities will use some HAP stripper for exempt processes.

<sup>f</sup> We have assumed that all respondents will need to develop a record keeping system.

<sup>g</sup> We have assumed that each respondent will write compliance status information report.

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

<sup>i</sup> The capital and O&M cost for this operation has been included in the table for cleaning operations (see Table 1a).

**Table 1d: Annual Respondent Burden and Cost – NESHAP for Aerospace Manufacturing and Rework Facilities (40 CFR Part 63, Subpart GG) (Renewal) (Specialty Coating Operations)**

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>	(E) Technical person- hours per year (E=CxD)	(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>
1. Applications								
2. Surveys and studies								
3. Reporting requirements								
A. Familiarize with regulatory requirements <sup>c</sup>	1	1	1	82	82	4.1	8.2	\$10,921.58
B. Required activities								
Initial performance tests	N/A							
Repeat performance test	N/A							
C. Create information	See 4C							
D. Gather existing information	See 4C							
E. Write report <sup>e</sup>								
Notification of construction/reconstruction	N/A							
Notification of physical and operational changes	N/A							
Notification of actual startup	N/A							
Notification of change in production capacity	N/A							
Compliance status information report	N/A							
Waiver application	N/A							
Preparation of site-specific test plan	N/A							
Notification of initial	N/A							

performance test								
Report of initial test	N/A							
Annual and semiannual report – including report of periods of noncompliance	N/A							
<b>Subtotal for Reporting Requirements</b>						<b>94</b>		<b>\$10,922</b>
4. Recordkeeping requirements								
A. Familiarize with regulatory requirements	See 3A							
B. Plan activities <sup>d</sup>	4	1	4	0	0	0	0	\$0
C. Implement activities								
Compliance coating records <sup>f</sup>	30.5	1	30.5	82	2,501	125.05	250.1	\$333,108.19
Control device maintenance or rolling material balance log (organics) <sup>e</sup>	N/A							
Control device maintenance log (inorganics) <sup>e</sup>	N/A							
D. Develop record system <sup>d</sup>	10	1	10	0	0	0	0	\$0
E. Time to enter information								
Records of all measurements and information required by standard	See 4C							
F. Time to train personnel <sup>d, g</sup>	2	3	6	0	0	0	0	\$0
G. Time for audits <sup>h</sup>	10	1	10	82	820	41	82	\$109,215.80
<b>Subtotal for Recordkeeping Requirements</b>						<b>3,819</b>		<b>\$442,324</b>
<b>TOTAL LABOR BURDEN AND COST (rounded) <sup>i</sup></b>						<b>3,910</b>		<b>\$453,000</b>
<b>TOTAL CAPITAL AND O&amp;M COST (rounded) <sup>i, j</sup></b>								<b>\$0</b>
<b>GRAND TOTAL (rounded) <sup>i</sup></b>								<b>\$453,000</b>

**Assumptions:**

<sup>a</sup> We have assumed that the average number of respondents that will be subject to this rule will be 144. Of the 144 respondents, 108 are privately-owned and 36

are Federally-owned. There will be no new additional sources during the next three years of this ICR. Of the 144 facilities we assume 82 privately-owned facilities and 27 Federally-owned facilities will have specialty coating operations.

<sup>b</sup> This ICR uses the following labor rates: \$141.06 per hour for Executive, Administrative, and Managerial labor; \$120.27 per hour for Technical labor, and \$58.67 per hour for Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, June 2019, "Table 2. Civilian Workers, by Occupational and Industry group." The rates are from column 1, "Total Compensation." The rates have been increased by 110 percent to account for the benefit packages available to those employed by private industry.

<sup>c</sup> We have assumed all existing sources will have to re-familiarize with regulatory requirements each year.

<sup>d</sup> One-time cost that is only incurred during the first year of compliance.

<sup>e</sup> We have assumed that specialty coatings operations will not require installation of additional booths and control devices, and that the costs associated with these devices is covered under the compliance costs for coating operations.

<sup>f</sup> These costs vary by facility, and are calculated assuming one hour per year per specialty coating used. The 2015 amendment provides a separate worksheet which breaks down the assumed number of specialty coatings by facility based on 2011 ICR survey responses. This ICR averages the hours over the 82 facilities to get ~30.5 person hours per occurrence.

<sup>g</sup> We have assumed one person per shift will require training on recordkeeping requirements and system.

<sup>h</sup> We have assumed auditing activities will coincide with similar activities for coating operations, so would entail about half the effort assumed for the same activity in coating operations.

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

<sup>j</sup> The capital and O&M cost for this operation has been included in the table for cleaning operations (see Table 1a).

**Table 1e: Summary of Annual Respondent Burden and Cost for Tables 1a, 1b, 1c, & 1d – NESHAP for Aerospace Manufacturing and Rework Facilities (40 CFR Part 63, Subpart GG) (Renewal)**

<b>Burden</b>	<b>Burden Hours per Year for Reporting</b>	<b>Burden Hours per Year for Recordkeeping</b>	<b>Total Burden Hours per Year (rounded) <sup>a</sup></b>	<b>Total Annual Labor Costs (\$) (rounded) <sub>a, b</sub></b>
1a. Cleaning Operations	5,078	33,460	38,500	\$4,570,000
1b. Coating Operations	4,934	66,749	71,700	\$8,300,000
1c. Depainting Operations	133	642	775	\$89,800
1d. Specialty Coating Operations	94	3,819	3,910	\$453,000
<b>Total Burden and Costs (rounded)</b>	<b>10,200</b>	<b>105,000</b>	<b>115,000</b>	<b>\$13,400,000</b>

**Assumptions:**

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

<sup>b</sup> The total annual costs includes both labor and capital and O&M costs.

**Table 2a: Annual Burden and Cost for Federal Government-Owned Facilities – NESHAP for Aerospace Manufacturing and Rework Facilities (40 CFR Part 63, Subpart GG) (Renewal) (Cleaning Operations)**

<b>Burden item</b>	<b>(A) Person hours per occurrence</b>	<b>(B) No. of occurrences per respondent per year</b>	<b>(C) Person hours per respondent per year (C=AxB)</b>	<b>(D) Respondents per year <sup>a</sup></b>	<b>(E) Technical person- hours per year (E=CxD)</b>	<b>(F) Management person hours per year (F=Ex0.05)</b>	<b>(G) Clerical person hours per year (G=Ex0.1)</b>	<b>(H) Total Cost Per Year <sup>b</sup></b>
1. Applications	N/A							
2. Surveys and studies	N/A							
3. Reporting requirements								
A. Familiarize with regulatory requirements <sup>c</sup>	1	1	1	36	36	1.8	3.6	\$1,996.06
B. Required activities	N/A							
C. Create information	See 3E & 4C							
D. Gather existing information	See 3E & 4C							
E. Write report								
Notification of construction/reconstruction	2	1	2	0	0	0	0	\$0
Notification of physical and operational changes <sup>d</sup>	8	1	8	2	16	0.8	1.6	\$887.14
Notification of actual startup	2	1	2	0	0	0	0	\$0
Notification of change in production capacity	2	1	2	0	0	0	0	\$0
Compliance status information report <sup>e</sup>	20	1	20	36	720	36	72	\$39,921.12
Waiver application <sup>f</sup>	4	1	4	4	16	0.8	1.6	\$887.14
Preparation of site-specific test plan	N/A							
Notification of initial performance test	N/A							
Report of initial test	N/A							

Semiannual report – including report of periods of noncompliance <sup>g</sup>	12	2	24	29	696	34.8	69.6	\$38,590.42
<b>Subtotal for Reporting Requirements</b>					<b>1,707</b>			<b>\$82,282</b>
4. Recordkeeping requirements								
A. Familiarize with regulatory requirements	See 3A							
B. Plan activities	4	1	4	36	144	7.2	14.4	\$7,984.22
C. Implement activities								
Solvent information records	4	2	8	36	288	14.4	28.8	\$15,968.45
Approved composition solvent records (demonstrating compliance) <sup>h</sup>	4	1	4	11	44	2.2	4.4	\$2,439.62
Non-approved list solvent usage records <sup>i</sup>	1	12	12	32	384	19.2	38.4	\$21,291.26
Solvent usage log for exempt processes <sup>j</sup>	0.5	12	6	25	150	7.5	15	\$8,316.90
Log of gun cleaner leaks <sup>k</sup>	1	6	6	7	42	2.1	4.2	\$2,328.73
D. Develop record system <sup>l</sup>	20	1	20	36	720	36	72	\$39,921.12
E. Time to enter information								
Records of all measurements and information required by standard	See 4C							
F. Time to train personnel <sup>m</sup>	4	50	200	36	7,200	360	720	\$399,211.20
G. Time for audits	20	1	20	36	720	36	72	\$39,921.12
<b>Subtotal for Recordkeeping Requirements</b>					<b>11,146</b>			<b>\$537,383</b>
<b>TOTAL LABOR BURDEN AND COST (rounded)<sup>n</sup></b>					<b>12,900</b>			<b>\$620,000</b>
<b>TOTAL CAPITAL AND O&amp;M COST (rounded)<sup>n,o</sup></b>								<b>\$36,000</b>
<b>GRAND TOTAL (rounded)<sup>n</sup></b>								<b>\$656,000</b>

**Assumptions:**

- <sup>a</sup> We have assumed that the average number of respondents that will be subject to this rule will be 144. Of the 144 respondents, 108 are privately-owned and 36 are Federally-owned. There will be no new additional sources during the next three years 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 from the Office of Personnel Management (OPM), 2019 General Schedule, which excludes locality rates of pay. The rates have been increased by 60 percent to account for the benefit packages available to government employees.
- <sup>c</sup> We have assumed all existing sources will have to re-familiarize with regulatory requirements each year.
- <sup>d</sup> We have assumed that 5 percent of the total existing facilities will write the physical and operational changes report ( $36 \times 5\% = 1.8$ , rounded to 2).
- <sup>e</sup> We have assumed that each respondent will write compliance status information report.
- <sup>f</sup> We have assumed that 10 percent of the respondents will request a waiver ( $36 \times 10\% = 3.6$ , rounded to 4).
- <sup>g</sup> We have assumed that 80 percent of facilities will have excess emissions or will change their process in some way and will submit semiannual reports ( $36 \times 80\% = 28.8$ , rounded to 29).
- <sup>h</sup> We have assumed that 30 percent of facilities will use the approved list of solvents ( $36 \times 30\% = 10.8$ , rounded to 11).
- <sup>i</sup> We have assumed that 90 percent of facilities will use some solvents not on the approved list ( $36 \times 90\% = 32.4$ , rounded to 32).
- <sup>j</sup> We have assumed that 70 percent of facilities will use some solvents for exempt processes ( $36 \times 70\% = 25.2$ , rounded to 25).
- <sup>k</sup> We have assumed that 20 percent of facilities will have a leak in their enclosed gun cleaner ( $36 \times 20\% = 7.2$ , rounded to 7).
- <sup>l</sup> We have assumed that all facilities will need to develop a record keeping system.
- <sup>m</sup> We have assumed that each respondent will take 4 hours 50 times per year to complete task.
- <sup>n</sup> Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.
- <sup>o</sup> The total capital and O&M cost in this table are the total for cleaning, coating, repainting and specialty coating operations combined (see Tables 1b-1d for burden associated with these operations).



**Table 2b: Annual Burden and Cost for Federal Government-Owned Facilities – NESHAP for Aerospace Manufacturing and Rework Facilities (40 CFR Part 63, Subpart GG) (Renewal) (Coating Operations)**

Burden item	(A) Person hours per occurrence	(B) No. of occurrences per respondent per year	(C) Person hours per responden t per year (C=AxB)	(D) Respondents per year <sup>a</sup>	(E) Technical person- hours per year (E=CxD)	(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>
1. Applications	N/A							
2. Surveys and studies	N/A							
3. Reporting requirements								
A. Familiarize with regulatory requirements <sup>c</sup>	1	1	1	36	36	1.8	3.6	\$1,996.06
B. Required activities								
Initial performance tests <sup>d</sup>	280	1	280	1	280	14	28	\$15,524.88
Repeat performance test <sup>e</sup>	280	1	280	0	0	0	0	\$0
C. Create information	See 3E & 4C							
D. Gather existing information	See 3E & 4C							
E. Write report								
Notification of construction/reconstruction	2	1	2	0	0	0	0	\$0
Notification of physical and operational changes <sup>f</sup>	8	1	8	2	16	0.8	1.6	\$887.14
Notification of actual startup	2	1	2	0	0	0	0	\$0
Notification of change in production capacity	2	1	2	0	0	0	0	\$0
Compliance status information report <sup>k</sup>	10	1	10	36	360	18	36	\$19,960.56
Waiver application <sup>g</sup>	4	1	4	4	16	0.8	1.6	\$887.14
Preparation of site-specific test	See 3B							

plan								
Notification of initial performance test <sup>d</sup>	2	1	2	1	2	0.1	0.2	\$110.89
Report of initial test	See 3B							
Annual and semiannual report – including report of periods of noncompliance <sup>h</sup>	11	2	22	29	638	31.9	63.8	\$35,374.55
<b>Subtotal for Reporting Requirements</b>						<b>1,550</b>		<b>\$74,741</b>
4. Recordkeeping requirements								
A. Familiarize with regulatory requirements	See 3A							
B. Plan activities	4	1	4	36	144	7.2	14.4	\$7,984.22
C. Implement activities								
Compliance coating records	1	12	12	36	432	21.6	43.2	\$23,952.67
Daily records of weighted average mass <sup>i</sup>	1	250	250	4	1,000	50	100	\$55,446.00
Control device maintenance or rolling material balance log (organics) <sup>d</sup>	0.5	250	125	1	125	6.25	12.5	\$6,930.75
Control device maintenance log (inorganics)	0.25	250	62.5	36	2,250	112.5	225	\$124,753.50
D. Develop record system <sup>j</sup>	10	1	10	36	360	18	36	\$19,960.56
E. Time to enter/maintain information								
Records of all measurements and information required by standard	See 4C							
F. Time to train personnel	8	50	400	36	14,400	720	1,440	\$798,422.40
G. Time for audits	20	1	20	36	720	36	72	\$39,921.12
<b>Subtotal for Recordkeeping Requirements</b>						<b>22,346</b>		<b>\$1,077,371</b>
<b>TOTAL LABOR BURDEN AND COST (rounded) <sup>l</sup></b>						<b>23,900</b>		<b>\$1,150,000</b>
<b>TOTAL CAPITAL AND O&amp;M COST (rounded) <sup>l,m</sup></b>								<b>\$0</b>
<b>GRAND TOTAL (rounded) <sup>l</sup></b>								<b>\$1,150,000</b>

**Assumptions:**

- <sup>a</sup> We have assumed that the average number of respondents that will be subject to this rule will be 144. Of the 144 respondents, 108 are privately-owned and 36 are Federally-owned. There will be no new additional sources during the next three years 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 from the Office of Personnel Management (OPM), 2019 General Schedule, which excludes locality rates of pay. The rates have been increased by 60 percent to account for the benefit packages available to government employees.
- <sup>c</sup> We have assumed all existing sources will have to re-familiarize with regulatory requirements each year.
- <sup>d</sup> We assume that 1 Federally-owned facility will use add-on control equipment for maskant application.
- <sup>e</sup> We have assumed that 20% of Federally-owned facility with add-on control equipment will repeat performance test ( $1 \times 20\% = 0.2$ , rounded to 0).
- <sup>f</sup> We have assumed that 5 percent of the total existing facilities will write the physical and operational changes report ( $36 \times 5\% = 1.8$ , rounded to 2).
- <sup>g</sup> We have assumed that 10 percent of the respondents will request a waiver ( $36 \times 10\% = 3.6$ , rounded to 4).
- <sup>h</sup> We have assumed that 80 percent of facilities will have excess emissions or will change their process in some way and will submit semiannual reports ( $36 \times 80\% = 28.8$ , rounded to 29).
- <sup>i</sup> The final rule required monthly records. Daily averaging was included in the cost analysis because 90 percent of the industry is located in non-attainment areas and will be required to use daily averaging by the permitting agency.
- <sup>j</sup> We have assumed that all facilities will need to develop a record keeping system.
- <sup>k</sup> We have assumed that each respondent will write compliance status information report.
- <sup>l</sup> Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.
- <sup>m</sup> The capital and O&M cost for this operation has be included in the table for cleaning operations (see Table 1a).

**Table 2c: Annual Burden and Cost for Federal Government-Owned Facilities – NESHAP for Aerospace Manufacturing and Rework Facilities (40 CFR Part 63, Subpart GG) (Renewal) (Depainting Operations)**

<b>Burden item</b>	<b>(A) Person hours per occurrence</b>	<b>(B) No. of occurrences per respondent per year</b>	<b>(C) Person hours per respondent per year (C=AxB)</b>	<b>(D) Respondents per year <sup>a</sup></b>	<b>(E) Technical person- hours per year (E=CxD)</b>	<b>(F) Management person hours per year (F=Ex0.05)</b>	<b>(G) Clerical person hours per year (G=Ex0.1)</b>	<b>(H) Total Cost Per Year <sup>b</sup></b>
1. Applications	N/A							
2. Surveys and studies	N/A							
3. Reporting requirements								
A. Familiarize with regulatory requirements <sup>c</sup>	1	1	1	1	1	0.05	0.1	\$55.45
B. Required activities	N/A							
Initial performance tests	280	1	280	0	0	0	0	\$0
Repeat performance test	280	1	280	0	0	0	0	\$0
C. Create information	See 3E & 4C							
D. Gather existing information	See 3E & 4C							
E. Write report								
Notification of construction/reconstruction	2	1	2	0	0	0	0	\$0
Notification of physical and operational changes	8	1	8	0	0	0	0	\$0
Notification of actual startup	2	1	2	0	0	0	0	\$0
Notification of change in production capacity	2	1	2	0	0	0	0	\$0
Compliance status information report <sup>g</sup>	10	1	10	1	10	0.5	1	\$554.46
Waiver application	4	1	4	0	0	0	0	\$0
Preparation of site-specific test plan	N/A							
Notification of initial	2	1	2	0	0	0	0	\$0



<b>COST (rounded)</b> <sup>h,i</sup>								
<b>GRAND TOTAL (rounded)</b> <sup>h</sup>								<b>\$6,150</b>

**Assumptions:**

<sup>a</sup> We have assumed that the average number of respondents that will be subject to this rule will be 144. Of the 144 respondents, 108 are privately-owned and 36 are Federally-owned. There will be no new additional sources during the next three years of this ICR. Of the 144 facilities we assume 4 privately-owned facilities and 1 Federally-owned facility will have depainting operations.

<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 from the Office of Personnel Management (OPM), 2019 General Schedule, which excludes locality rates of pay. The rates have been increased by 60 percent to account for the benefit packages available to government employees.

<sup>c</sup> We have assumed all existing sources will have to re-familiarize with regulatory requirements each year.

<sup>d</sup> We have assumed that 80 percent of facilities will have excess emissions or will change their process in some way and will submit semiannual reports (1 x 80% = 0.8, rounded to 1).

<sup>e</sup> We have assumed that 1 percent of facilities will use HAP containing chemical strippers as the primary stripping techniques, 29 percent will use media blasting equipment, 70 percent will use non-HAP chemical strippers, and 100 percent of facilities will use some HAP stripper for exempt processes.

<sup>f</sup> We have assumed that all respondents will need to develop a record keeping system.

<sup>g</sup> We have assumed that each respondent will write compliance status information report.

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

<sup>i</sup> The capital and O&M cost for this operation has been included in the table for cleaning operations (see Table 1a).

**Table 2d: Annual Burden and Cost for Federal Government-Owned Facilities – NESHAP for Aerospace Manufacturing and Rework Facilities (40 CFR Part 63, Subpart GG) (Renewal) (Specialty Coating Operations)**

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>	(E) Technical person- hours per year (E=CxD)	(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>
1. Applications								
2. Surveys and studies								
3. Reporting requirements								
A. Familiarize with regulatory requirements <sup>c</sup>	1	1	1	27	27	1.35	2.7	\$1,497.04
B. Required activities								
Initial performance tests	N/A							
Repeat performance test	N/A							
C. Create information	See 4C							
D. Gather existing information	See 4C							
E. Write report <sup>e</sup>								
Notification of construction/reconstruction	N/A							
Notification of physical and operational changes	N/A							
Notification of actual startup	N/A							
Notification of change in production capacity	N/A							
Compliance status information report	N/A							
Waiver application	N/A							
Preparation of site-specific test plan	N/A							
Notification of initial	N/A							

performance test								
Report of initial test	N/A							
Annual and semiannual report – including report of periods of noncompliance	N/A							
<b>Subtotal for Reporting Requirements</b>						<b>31</b>		<b>\$1,442</b>
4. Recordkeeping requirements								
A. Familiarize with regulatory requirements	See 3A							
B. Plan activities <sup>d</sup>	4	1	4	0	0	0	0	\$0
C. Implement activities								
Compliance coating records <sup>f</sup>	61.6	1	61.6	27	1,663.2	83.16	166.32	\$92,217.79
Control device maintenance or rolling material balance log (organics) <sup>e</sup>	N/A							
Control device maintenance log (inorganics) <sup>e</sup>	N/A							
D. Develop record system <sup>d</sup>	10	1	10	0	0	0	0	\$0
E. Time to enter information								
Records of all measurements and information required by standard	See 4C							
F. Time to train personnel <sup>d, g</sup>	2	3	6	0	0	0	0	\$0
G. Time for audits <sup>h</sup>	10	1	10	27	270	13.5	27	\$14,970.42
<b>Subtotal for Recordkeeping Requirements</b>						<b>2,223</b>		<b>\$107,188</b>
<b>TOTAL LABOR BURDEN AND COST (rounded) <sup>i</sup></b>						<b>2,250</b>		<b>\$109,000</b>
<b>TOTAL CAPITAL AND O&amp;M COST (rounded) <sup>i, j</sup></b>								<b>\$0</b>
<b>GRAND TOTAL (rounded) <sup>i</sup></b>								<b>\$109,000</b>

**Assumptions:**

<sup>a</sup> We have assumed that the average number of respondents that will be subject to this rule will be 144. Of the 144 respondents, 108 are privately-owned and 36



are Federally-owned. There will be no new additional sources during the next three years of this ICR. Of the 144 facilities we assume 82 privately-owned facilities and 27 Federally-owned facilities will have specialty coating operations.

<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 from the Office of Personnel Management (OPM), 2019 General Schedule, which excludes locality rates of pay. The rates have been increased by 60 percent to account for the benefit packages available to government employees.

<sup>c</sup> We have assumed all existing sources will have to re-familiarize with regulatory requirements each year.

<sup>d</sup> One-time cost that is only incurred during the first year of compliance.

<sup>e</sup> We have assumed that specialty coatings operations will not require installation of additional booths and control devices, and that the costs associated with these devices is covered under the compliance costs for coating operations.

<sup>f</sup> These costs vary by facility, and are calculated assuming one hour per year per specialty coating used. The 2015 amendment provides a separate worksheet which breaks down the assumed number of specialty coatings by facility based on 2011 ICR survey responses. This ICR averages the hours over the 27 facilities to get ~61.6 person hours per occurrence.

<sup>g</sup> We have assumed one person per shift will require training on recordkeeping requirements and system.

<sup>h</sup> We have assumed auditing activities will coincide with similar activities for coating operations, so would entail about half the effort assumed for the same activity in coating operations.

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

<sup>j</sup> The capital and O&M cost for this operation has be included in the table for cleaning operations (see Table 1a).

**Table 2e: Summary of Annual Burden and Cost for Federal Government-Owned Facilities for Tables 2a, 2b, 2c, & 2d – NESHAP for Aerospace Manufacturing and Rework Facilities (40 CFR Part 63, Subpart GG) (Renewal)**

<b>Burden</b>	<b>Burden Hours per Year for Reporting</b>	<b>Burden Hours per Year for Recordkeeping</b>	<b>Total Burden Hours per Year (rounded) <sup>a</sup></b>	<b>Total Annual Costs (\$) (rounded) <sup>a, b</sup></b>
1a. Cleaning Operations	1,707	11,146	12,900	\$656,000
1b. Coating Operations	1,550	22,346	23,900	\$1,150,000
1c. Depainting Operations	40	87	128	\$6,150
1d. Specialty Coating Operations	31	2,223	2,250	\$109,000
<b>Total Burden and Costs (rounded)</b>	<b>3,330</b>	<b>35,800</b>	<b>39,200</b>	<b>\$1,920,000</b>

**Assumptions:**

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

<sup>b</sup> The total annual costs includes both labor and capital and O&M costs.

**Table 3: Average Annual EPA Burden and Cost – NESHAP for Aerospace Manufacturing and Rework Facilities (40 CFR Part 63, Subpart GG) (Renewal)**

Activity	(A) EPA person hours per occurrence	(B) No. of occurrences per plant per year	(C) Person hours per plant per year (C=AxB)	(D) Plants per year <sup>a</sup>	(E) Technical person- hours per year (E=CxD)	(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>
1. Initial performance test	80	1	80	4	320	16	32	\$17,742.72
2. Repeat performance test								
Retesting preparation <sup>c</sup>	16	1	16	1	16	0.8	1.6	\$887.14
Retesting <sup>d</sup>	80	1	80	1	80	4	8	\$4,435.68
3. Report review								
Notification of construction/reconstruction	2	1	2	0	0	0	0	\$0
Notification of physical or operational changes <sup>e</sup>	2	1	2	14	28	1.4	2.8	\$1,552.49
Notification of anticipated startup	2	1	2	0	0	0	0	\$0
Notification of actual startup	2	1	2	0	0	0	0	\$0
Notification of changes in production capacity	2	1	2	0	0	0	0	\$0
Compliance status information report <sup>f</sup>	6	1	6	293	1,758	87.9	175.8	\$97,474.07
Waiver application <sup>g</sup>	6	1	6	30	180	9	18	\$9,980.28
Review of site specific test plan	N/A							
Notification of initial performance test <sup>h</sup>	2	1	2	4	8	0.4	0.8	\$443.57
4. Report review								
Report of initial test	8	1	8	0	0	0	0	\$0
Review of annual and semiannual reports <sup>i</sup>	3	2	6	234	1,404	70.2	140.4	\$77,846.18
<b>TOTAL ANNUAL BURDEN AND COST (rounded) <sup>j</sup></b>						<b>4,360</b>		<b>\$210,000</b>

**Assumptions:**

- <sup>a</sup> We have assumed that the average number of respondents that will be subject to this rule will be 144. Of the 144 respondents, 108 are privately-owned and 36 are Federally-owned. There will be no new additional sources during the next three years 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 from the Office of Personnel Management (OPM), 2019 General Schedule, which excludes locality rates of pay. The rates have been increased by 60 percent to account for the benefit packages available to government employees.
- <sup>c</sup> We have assumed that it will take 16 hours to prepare for retesting.
- <sup>d</sup> We have assumed that 20 percent of respondents will fail the initial performance test and will have to be retested.
- <sup>e</sup> We have assumed that it will take two hours once per year to review the notification of physical or operational change.
- <sup>f</sup> We have assumed that it will take six hours to review the compliance status information report.
- <sup>g</sup> We have assumed that the Agency will take 6 hours to review the waiver application for each facility.
- <sup>h</sup> We have assumed that it will take 2 hours to review the notice of initial performance test.
- <sup>i</sup> We have assumed that it will take 3 hours to review each semiannual report.
- <sup>j</sup> Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.