

**Table 1: Annual Respondent Burden and Cost – NESHAP for Plastic Parts and Products Su
PPPP) (Amendments)**

Year 1

Burden Item	(A) Person hours per occurrence	(B) Number of occurrences per year	(C) Person hrs per respondent per year (C=AxB)	(D) Respondents per year ^a
1. Reporting requirements				
a. Familiarization with the regulatory requirements	4	1	4	125
b. Process/review information	4	4	16	0
c. Required activities				
i. Add-on control performance test ^c	30	1	30	0
ii. Repeat add-on control performance test ^c	30	1	30	0
d. Write reports				
i. Initial notification	2	1	2	0
ii. Notification of compliance status	2	1	2	0
iii. Notification of construction/ reconstruction	2	1	2	0
iv. Notification of actual startup	2	1	2	0
v. Notification of initial performance test/add-on control performance test ^{c,d}	2	1	2	0
vi. Report of initial performance test/add-on control performance test ^{c,d}	10	1	10	0
vii. Semiannual report ^e	6	2	12	0
viii. Excess emissions report	2	2	4	0
ix. Startup, shutdown, malfunction report ^f	2	1	2	0
Subtotal for Reporting Requirements				
2. Recordkeeping requirements				
a. Familiarization with the regulatory requirements	<i>See 1.a.</i>			
b. Plan activities	12	1	12	0
c. Implement activities	12	1	12	0
d. Maintain record system for material used	20	1	20	0
e. Time to enter information				
i. Material usage ^g	0.5	365	182.5	0
ii. Compliance calculation ^h	2	12	24	0
f. Time to train personnel	10	1	10	0
g. Store, file, and maintain records ⁱ	2	12	24	0
h. Retrieve records/reports ^j	1	12	12	0
i. Revise record systems due to SSM revisions ^k	8	1	8	125
j. Become familiar with CEDRI for electronic filing of notifications and reports ^l	8	1	8	125
Subtotal for Recordkeeping Requirements				
Total Labor Burden and Cost (rounded) ^m				
Total Capital and O&M Cost (rounded) ^m				
Grand Total (rounded) ^m				

Assumptions:

- ^a We estimate that 125 existing sources will be subject to the rule over the three-year period of this ICR, and no new
- ^b This ICR uses the following labor rates: \$147.40 per hour for Executive, Administrative, and Managerial labor; \$11 for Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, June 2018 Industry group.” The rates are from column 1, “Total Compensation.” The rates have been increased by 110% to account by private industry.
- ^c The performance test requirement will affect 3 facilities with add-on controls in the third year. The emission units will have a testing requirement in their permits. We assume a 5% failure and re-test rate ($3 \times 0.05 = 0.15$). Since the fraction of re-tests will be done.
- ^d New sources have an initial testing requirement, but we assume no new sources will become subject during the three
- ^e We assume that each respondent will take 6 hours twice per year to write the semiannual report.
- ^f It is estimated that 25 percent of facilities using add-on controls submit startup, shutdown, and malfunction report on
- ^g We assumed that each respondent will take 0.5 hours each day to enter daily records of mass fraction of organic HAP mass fraction of coating solids for each coating.
- ^h We have assumed that each respondent will take 2 hours once per month to enter compliance calculations.
- ⁱ We have assumed that each respondent will take 2 hours once per month to store, file and maintain records.
- ^j We have assumed that each respondent will take 1 hour once per month to retrieve records/reports.
- ^k We assume that costs associated with elimination of the SSM exemption include time for re-evaluating previously d
- ^l Responses in year one associated with the use of electronic reporting include becoming familiar with CEDRI and the
- ^m Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

Surface Coating (40 CFR Part 63, Subpart

[illegible]

Labor Rates:	
Management	\$147.40
Technical	\$117.92
Clerical	\$57.02

sources will become subject.

17.92 per hour for Technical labor, and \$57.02 per hour
, “Table 2. Civilian Workers, by Occupational and
ount for the benefit packages available to those employed

ith add-on controls at these 3 facilities do not already
on of re-tests (0.15) rounds down to zero, we assume no

2-year period of this ICR.

once per year.

P for each coating, thinner, or cleaning material, and

eveloped SSM record systems in year one.

e semi-annual reporting form.

**Table 2: Annual Respondent Burden and Cost – NESHAP for Plastic Parts and Products Su
PPPP) (Amendments)**

Year 2

Burden Item	(A) Person hours per occurrence	(B) Number of occurrences per year	(C) Person hrs per respondent per year (C=AxB)	(D) Respondents per year ^a
1. Reporting requirements				
a. Familiarization with the regulatory requirements	4	1	4	0
b. Process/review information	4	4	16	0
c. Required activities				
i. Add-on control performance test ^c	30	1	30	0
ii. Repeat add-on control performance test ^c	30	1	30	0
d. Write reports				
i. Initial notification	2	1	2	0
ii. Notification of compliance status	2	1	2	0
iii. Notification of construction/ reconstruction	2	1	2	0
iv. Notification of actual startup	2	1	2	0
v. Notification of initial performance test/add-on control performance test ^{c,d}	2	1	2	0
vi. Report of initial performance test/add-on control performance test ^{c,d}	10	1	10	0
vii. Semiannual report ^e	6	2	12	0
viii. Excess emissions report	2	2	4	0
ix. Startup, shutdown, malfunction report ^f	2	1	2	0
Subtotal for Reporting Requirements				
2. Recordkeeping requirements				
a. Familiarization with the regulatory requirements	<i>See 1.a.</i>			
b. Plan activities	12	1	12	0
c. Implement activities	12	1	12	0
d. Maintain record system for material used	20	1	20	0
e. Time to enter information				
i. Material usage ^g	0.5	365	182.5	0
ii. Compliance calculation ^h	2	12	24	0
f. Time to train personnel	10	1	10	0
g. Store, file, and maintain records ⁱ	2	12	24	0
h. Retrieve records/reports ^j	1	12	12	0
i. Revise record systems due to SSM revisions ^k	8	1	8	0
j. Become familiar with CEDRI for electronic filing of notifications and reports ^l	8	1	8	0
Subtotal for Recordkeeping Requirements				
Total Labor Burden and Cost (rounded) ^m				
Total Capital and O&M Cost (rounded) ^m				
Grand Total (rounded) ^m				

Assumptions:

- ^a We estimate that 125 existing sources will be subject to the rule over the three-year period of this ICR, and no new
- ^b This ICR uses the following labor rates: \$147.40 per hour for Executive, Administrative, and Managerial labor; \$11 for Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, June 2018 Industry group.” The rates are from column 1, “Total Compensation.” The rates have been increased by 110% to account by private industry.
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- ^d New sources have an initial testing requirement, but we assume no new sources will become subject during the three
- ^e We assume that each respondent will take 6 hours twice per year to write the semiannual report.
- ^f It is estimated that 25 percent of facilities using add-on controls submit startup, shutdown, and malfunction report on
- ^g We assumed that each respondent will take 0.5 hours each day to enter daily records of mass fraction of organic HAP mass fraction of coating solids for each coating.
- ^h We have assumed that each respondent will take 2 hours once per month to enter compliance calculations.
- ⁱ We have assumed that each respondent will take 2 hours once per month to store, file and maintain records.
- ^j We have assumed that each respondent will take 1 hour once per month to retrieve records/reports.
- ^k We assume that costs associated with elimination of the SSM exemption include time for re-evaluating previously d
- ^l Responses in year one associated with the use of electronic reporting include becoming familiar with CEDRI and the
- ^m Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

Surface Coating (40 CFR Part 63, Subpart

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Labor Rates:	
Management	\$147.40
Technical	\$117.92
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2-year period of this ICR.

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.P for each coating, thinner, or cleaning material, and

eveloped SSM record systems in year one.

e semi-annual reporting form.

**Table 3: Annual Respondent Burden and Cost – NESHAP for Plastic Parts and Products Su
PPPP) (Amendments)**

Year 3

Burden Item	(A) Person hours per occurrence	(B) Number of occurrences per year	(C) Person hrs per respondent per year (C=AxB)	(D) Respondents per year ^a
1. Reporting requirements				
a. Familiarization with the regulatory requirements	4	1	4	0
b. Process/review information	4	4	16	0
c. Required activities				
i. Add-on control performance test ^c	30	1	30	3
ii. Repeat add-on control performance test ^c	30	1	30	0
d. Write reports				
i. Initial notification	2	1	2	0
ii. Notification of compliance status	2	1	2	0
iii. Notification of construction/ reconstruction	2	1	2	0
iv. Notification of actual startup	2	1	2	0
v. Notification of initial performance test/add-on control performance test ^{c,d}	2	1	2	3
vi. Report of initial performance test/add-on control performance test ^{c,d}	10	1	10	3
vii. Semiannual report ^e	6	2	12	0
viii. Excess emissions report	2	2	4	0
ix. Startup, shutdown, malfunction report ^f	2	1	2	0
Subtotal for Reporting Requirements				
2. Recordkeeping requirements				
a. Familiarization with the regulatory requirements	<i>See 1.a.</i>			
b. Plan activities	12	1	12	0
c. Implement activities	12	1	12	0
d. Maintain record system for material used	20	1	20	0
e. Time to enter information				
i. Material usage ^g	0.5	365	182.5	0
ii. Compliance calculation ^h	2	12	24	0
f. Time to train personnel	10	1	10	0
g. Store, file, and maintain records ⁱ	2	12	24	0
h. Retrieve records/reports ^j	1	12	12	0
i. Revise record systems due to SSM revisions ^k	8	1	8	0
j. Become familiar with CEDRI for electronic filing of notifications and reports ^l	8	1	8	0
Subtotal for Recordkeeping Requirements				
Total Labor Burden and Cost (rounded) ^m				
Total Capital and O&M Cost (rounded) ^m				
Grand Total (rounded) ^m				

Assumptions:

- ^a We estimate that 125 existing sources will be subject to the rule over the three-year period of this ICR, and no new
- ^b This ICR uses the following labor rates: \$147.40 per hour for Executive, Administrative, and Managerial labor; \$11.00 per hour for Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, June 2018 Industry group.” The rates are from column 1, “Total Compensation.” The rates have been increased by 110% to account for private industry.
- ^c The performance test requirement will affect 3 facilities with add-on controls in the third year. The emission units will have a testing requirement in their permits. We assume a 5% failure and re-test rate ($3 \times 0.05 = 0.15$). Since the fraction of re-tests will be done.
- ^d New sources have an initial testing requirement, but we assume no new sources will become subject during the three-year period.
- ^e We assume that each respondent will take 6 hours twice per year to write the semiannual report.
- ^f It is estimated that 25 percent of facilities using add-on controls submit startup, shutdown, and malfunction reports.
- ^g We assumed that each respondent will take 0.5 hours each day to enter daily records of mass fraction of organic HAPs and mass fraction of coating solids for each coating.
- ^h We have assumed that each respondent will take 2 hours once per month to enter compliance calculations.
- ⁱ We have assumed that each respondent will take 2 hours once per month to store, file and maintain records.
- ^j We have assumed that each respondent will take 1 hour once per month to retrieve records/reports.
- ^k We assume that costs associated with elimination of the SSM exemption include time for re-evaluating previously determined exemption status.
- ^l Responses in year one associated with the use of electronic reporting include becoming familiar with CEDRI and the reporting system.
- ^m Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

Surface Coating (40 CFR Part 63, Subpart

(E) Technical person hrs per year (E=CxD)	(F) Management person hrs per year (F=Ex0.05)	(G) Clerical person hrs per year (G=Ex0.1)	(H) Cost per year (\$) ^b
0	0	0	\$0
0	0	0	\$0
90	4.5	9.0	\$11,789.28
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
6	0.3	0.6	\$785.95
30	1.5	3.0	\$3,929.76
0	0	0	\$0
0	0	0	\$0
0.0	0	0	\$0
145			\$16,505
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
0			\$0
145			\$16,500
			\$57,000
			\$73,500

Labor Rates:	
Management	\$147.40
Technical	\$117.92
Clerical	\$57.02

sources will become subject.

17.92 per hour for Technical labor, and \$57.02 per hour
, “Table 2. Civilian Workers, by Occupational and
ount for the benefit packages available to those employed

ith add-on controls at these 3 facilities do not already
on of re-tests (0.15) rounds down to zero, we assume no

2-year period of this ICR.

once per year.

.P for each coating, thinner, or cleaning material, and

eveloped SSM record systems in year one.

e semi-annual reporting form.

Table 4 - Summary of Annual Respondent Burden and Cost - NESHAP for Plastic Parts and Containers (40 CFR Part 63, Subpart PPPP) (Amendments)

Year	Technical Hours	Management Hours	Clerical Hours	Total Labor Hours	Labor Costs
1	2,500	125	250	2,875	\$327,000
2	0	0	0	0	\$0
3	126	6	13	145	\$16,500
Total	2,626	131	263	3,020	\$344,000
Average	875	44	87.5	1,007	\$115,000

Year	Number of Respondents	Number of Responses	Reporting Hours	Recordkeeping Hours	Total Hours
1	125	375	575	2,300	2,875
2	125	0	0	0	0
3	125	9	145	0	145
Total	-	384	720	2,300	3,020
Average	125	128	240	767	1,007

Average annual additional costs per respondent:

\$1,070

Average annual additional hours per respondent:

8.1

Average annual additional hours per response:

7.9

nd Products Surface Coating

Non-Labor (Capital/Startup and O&M) Costs	Total Costs
\$0	\$327,000
\$0	\$0
\$57,000	\$73,500
\$57,000	\$401,000
\$19,000	\$134,000
Hours per Response	Hours Per Respondent
8.0	23.0
-	0.0
16	1.2
-	24.2
7.9	8.1

Table 5: Average Annual EPA Burden and Cost - NESHAP for Plastic Parts and Products, Subpart P (Amendments)

Year 1

Burden Item	(A) EPA Person hours per occurrence	(B) Number of occurrences per year	(C) EPA Person hrs per plant per year (C=AxB)	(D) Plants per year ^a	(E) Technical person hrs per year (E=CxD)
1. Initial performance test ^c	24	1	24	0	0
2. Repeat performance test ^c	24	0.05	1.2	0	0
3. Report review					
a. Initial notification	8	1	8	0	0
b. Notification of compliance status	8	1	8	0	0
c. Notification of construction/reconstruction	8	1	8	0	0
d. Notification of actual startup	8	1	8	0	0
e. Notification of performance test/add-on control performance test ^d	8	1	8	0	0
f. Report of performance test/add-on control performance test ^d	8	1	8	0	0
g. Semiannual report ^e	12	2	24	0	0
h. Excess emissions report ^f	4	2	8	0	0
i. Startup, shutdown, malfunction report	8	1	8	0	0
Total (rounded): ^g					

Assumptions:

^a We estimate that 125 existing sources will be subject to the rule over the three-year period of this ICR, and no new sources will be added.

^b This cost is based on the following labor rates which incorporates a 1.6 benefits multiplication factor to account for fringe benefits: Managerial rate of \$65.71 (GS-13, Step 5, \$41.07 + 60%), Technical rate of \$48.75 (GS-12, Step 1, \$30.47 + 60%) and \$16.49 + 60%). These rates are from the Office of Personnel Management (OPM) "2018 General Schedule" which is updated annually.

^c We assume it will take 24 hours to complete the initial performance test review. Assume a 5% failure and re-test rate (3 x 0.05 = 0.15).

^d Assumes that the 3 facilities without periodic testing requirements in their permits will do performance testing of year 3. We assume a 5% failure and re-test rate (3 x 0.05 = 0.15). Since the fraction of re-tests (0.15) rounds down to 0, we assume 0 re-tests.

^e We have assumed that it will take 12 hours two times per year to review the semiannual report.

^f We have assumed that it will take 4 hours two times per year to review the excess emissions report.

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

ts Surface Coating (40 CFR Part

[illegible]

Labor Rates:	
Management	\$65.71
Technical	\$48.75
Clerical	\$26.38

ew sources will become subject.

for government overhead expenses:
, and Clerical rate of \$26.38 (GS-6, Step 3,
h excludes locality rates of pay.

rate.

the emission units with add-on controls in to zero, we assume no re-tests will be done.

Table 6: Average Annual EPA Burden and Cost - NESHAP for Plastic Parts and Products, Subpart P (Amendments)

Year 2

Burden Item	(A) EPA Person hours per occurrence	(B) Number of occurrences per year	(C) EPA Person hrs per plant per year (C=AxB)	(D) Plants per year ^a	(E) Technical person hrs per year (E=CxD)
1. Initial performance test ^c	24	1	24	0	0
2. Repeat performance test ^c	24	0.05	1.2	0	0
3. Report review					
a. Initial notification	8	1	8	0	0
b. Notification of compliance status	8	1	8	0	0
c. Notification of construction/reconstruction	8	1	8	0	0
d. Notification of actual startup	8	1	8	0	0
e. Notification of performance test/add-on control performance test ^d	8	1	8	0	0
f. Report of performance test/add-on control performance test ^d	8	1	8	0	0
g. Semiannual report ^e	12	2	24	0	0
h. Excess emissions report ^f	4	2	8	0	0
i. Startup, shutdown, malfunction report	8	1	8	0	0
Total (rounded): ^g					

Assumptions:

^a We estimate that 125 existing sources will be subject to the rule over the three-year period of this ICR, and no new sources are expected to be subject to the rule.

^b This cost is based on the following labor rates which incorporates a 1.6 benefits multiplication factor to account for fringe benefits: Managerial rate of \$65.71 (GS-13, Step 5, \$41.07 + 60%), Technical rate of \$48.75 (GS-12, Step 1, \$30.47 + 60% \$16.49 + 60%). These rates are from the Office of Personnel Management (OPM) “2018 General Schedule” which is updated annually.

^c We assume it will take 24 hours to complete the initial performance test review. Assume a 5% failure and re-test rate.

^d Assumes that the 3 facilities without periodic testing requirements in their permits will do performance testing of year 3. We assume a 5% failure and re-test rate (3 x 0.05 = 0.15). Since the fraction of re-tests (0.15) rounds down to 0, we assume 0 re-tests.

^e We have assumed that it will take 12 hours two times per year to review the semiannual report.

^f We have assumed that it will take 4 hours two times per year to review the excess emissions report.

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

ts Surface Coating (40 CFR Part

[illegible]

Labor Rates:	
Management	\$65.71
Technical	\$48.75
Clerical	\$26.38

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for government overhead expenses:
, and Clerical rate of \$26.38 (GS-6, Step 3,
h excludes locality rates of pay.

rate.

the emission units with add-on controls in to zero, we assume no re-tests will be done.

Table 7: Average Annual EPA Burden and Cost - NESHAP for Plastic Parts and Products 63, Subpart PPPP) (Amendments)

Year 3

Burden Item	(A) EPA Person hours per occurrence	(B) Number of occurrences per year	(C) EPA Person hrs per plant per year (C=AxB)	(D) Plants per year ^a	(E) Technical person hrs per year (E=CxD)
1. Initial performance test ^c	24	1	24	0	0
2. Repeat performance test ^c	24	0.05	1.2	0	0
3. Report review					
a. Initial notification	8	1	8	0	0
b. Notification of compliance status	8	1	8	0	0
c. Notification of construction/reconstruction	8	1	8	0	0
d. Notification of actual startup	8	1	8	0	0
e. Notification of performance test/add-on control performance test ^d	8	1	8	3	24
f. Report of performance test/add-on control performance test ^d	8	1	8	3	24
g. Semiannual report ^e	12	2	24	0	0
h. Excess emissions report ^f	4	2	8	0	0
i. Startup, shutdown, malfunction report	8	1	8	0	0
Total (rounded): ^g					

Assumptions:

^a We estimate that 125 existing sources will be subject to the rule over the three-year period of this ICR, and no ne

^b This cost is based on the following labor rates which incorporates a 1.6 benefits multiplication factor to account for Managerial rate of \$65.71 (GS-13, Step 5, \$41.07 + 60%), Technical rate of \$48.75 (GS-12, Step 1, \$30.47 + 60%), \$16.49 + 60%). These rates are from the Office of Personnel Management (OPM) “2018 General Schedule” which

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^d Assumes that the 3 facilities without periodic testing requirements in their permits will do performance testing of t year 3. We assume a 5% failure and re-test rate (3 x 0.05 = 0.15). Since the fraction of re-tests (0.15) rounds down t

^e We have assumed that it will take 12 hours two times per year to review the semiannual report.

^f We have assumed that it will take 4 hours two times per year to review the excess emissions report.

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

3 Surface Coating (40 CFR Part

(F) Management person hrs per year (F=Ex0.05)	(G) Clerical person hrs per year (G=Ex0.1)	(H) Cost per year (\$) ^b
0	0	\$0
0	0	\$0
0	0	\$0
0	0	\$0
0	0	\$0
0	0	\$0
1.2	2.4	\$1,312.16
1.2	2.4	\$1,312.16
0	0	\$0
0	0	\$0
0	0	\$0
55		\$2,620

Labor Rates:	
Management	\$65.71
Technical	\$48.75
Clerical	\$26.38

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or government overhead expenses:
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excludes locality rates of pay.

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o zero, we assume no re-tests will be done.

**Table 8 - Summary of Annual Agency Burden and Cost - NESHAP for Plastic Parts and P
CFR Part 63, Subpart PPPP) (Amendments)**

Year	Technical Hours	Management Hours	Clerical Hours	Total Hours	Labor Costs
1	0	0	0	0	\$0
2	0	0	0	0	\$0
3	48	2	5	55	\$2,620
Total	48	2.4	4.8	55	\$2,620
Average	16.0	0.8	1.6	18	\$870

Year	Number of Responses	Total Hours
1	0	0
2	0	0
3	6	55
Total	6	55
Average	2	18

Average annual hours per response: 9.2

roducts Surface Coating (40

Non-Labor Costs	Total Costs
\$0	\$0
\$0	\$0
\$0	\$2,620
\$0	\$2,620
\$0	\$870

Capital/Startup vs. Operation and Maintenance (O&M) Costs				
(A) Performance Testing	(B) Capital Startup Cost for One Performance Test	(C) Number of Respondents Doing Testing	(D) Total Capital/ Startup Cost (B x C)	(E) Annual O&M Costs for One Respondent
Performance Testing	\$19,000	3	\$57,000	\$0
Totals (rounded)			\$57,000	

Note: In year 3, three sources test one control device each at a cost of \$19,000. We assume a 5% failure rate for the 1 rounds down to zero, we assume no cost for re-tests. Totals have been rounded to three significant figures.

Number of Respondents				
	Respondents That Submit Reports		Respondents That Do Not Submit Any Reports	
	(A)	(B)	(C)	(D)
Year	Number of New Respondents ¹	Number of Existing Respondents	Number of Existing Respondents that keep records but do not submit reports	Number of Existing Respondents That Are Also New Respondents
1	0	125	0	0
2	0	125	0	0
3	0	125	0	0
Average	0	125	0	0

¹ New respondents include sources with constructed, reconstructed and modified affected facilities.

(F)	(G)		
Number of Respondents with O&M	Total O&M, (E x F)		
0	\$0		
	\$0	Total	\$57,000

test. Since the fraction of re-tests (0.15)

(E)
Number of Respondents (E=A+B+C-D)
125
125
125
125