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	See 1.a.			
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 ¹	8	1	8	125
Subtotal for Recordkeeping Requirements				
Total Labor Burden and Cost (rounded) ^m				
Total Capital and O&M Cost (rounded) ^m				
Total Suprair and Souries (Touriesa)				

- ^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 acc by private industry.
- ^c The performance test requirement will affect 3 facilities with add-on controls in the third year. The emission units whave a testing requirement in their permits. We assume a 5% failure and re-test rate (3 x 0.05 = 0.15). Since the fraction 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 o
- ^g We assumed that each respondent will take 0.5 hours each day to enter daily records of mass fraction of organic HA 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
- ¹ 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.

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	(E) Technical person hrs per year (E=CxD)	(F) Manage- ment person hrs per year (F=Ex0.05)	(G) Clerical person hrs per year (G=Ex0.1)	(H) Cost per year (\$) ^b
	500	25	50	\$65,496.00
	0	0	0	\$0
-	0	0	0	\$0
ļ	0	0	0	\$0
-				
ļ	0	0	0	\$0
ļ	0	0	0	\$0
ļ	0	0	0	\$0
ļ	0	0	0	\$0
	0	0	0	\$0
	0	0	0	\$0
İ	0	0	0	\$0
İ	0	0	0	\$0
İ	0	0	0	\$0
İ		575		\$65,496
Ì				-
Ī				
Ī	0	0	0	\$0
	0	0	0	\$0
	0	0	0	\$0
	0	0	0	\$0
	0	0	0	\$0
	0	0	0	\$0
	0	0	0	\$0
	0	0	0	\$0
	1,000	50	100	\$130,992.00
	1,000	50	100	\$130,992.00
-		2,300	\$261,984	
t		2,880		\$327,000
t				\$0
-				\$327,000
L		<u> </u>		43=1,300

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

:-year period of this ICR.

nce 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 Hem					
a. Familiarization with the regulatory requirements	Burden Item	Person hours per	of occurrences	per respondent per year	Respondents
b. Process/review information c. Required activities i. Add-on control performance test ⟨ 30 1 30 0 0 ii. Repeat add-on control performance test ⟨ 30 1 30 0 0 d. Write reports i. Initial notification 2 1 2 0 0 ii. Notification of compliance status 2 1 2 0 iii. Notification of compliance status 2 1 2 0 iii. Notification of construction/ reconstruction 2 1 2 0 iii. Notification of actual startup 2 1 2 0 iii. Notification of actual startup 2 1 2 0 iii. Notification of actual startup 2 1 2 0 iii. Notification of actual startup 2 1 2 0 iii. Notification of initial performance test/add-on control performance test ⟨ d	1. Reporting requirements				
c. Required activities i. Add-on control performance test ^c ii. Repeat add-on control performance test ^c d. Write reports i. Initial notification 2 1 2 0 iii. Notification of compliance status 2 1 2 0 iii. Notification of construction/ reconstruction 2 1 2 0 iii. Notification of actual startup 2 1 2 0 v. Notification of initial performance test/add-on control performance test ^{cd} vi. Report of initial performance test/add-on control performance test ^{cd} vi. Report of initial performance test/add-on control performance test ^{cd} vii. Semiannual report ^c viii. Excess emissions report 2 2 2 4 0 subtotal for Reporting Requirements 2. Recordkeeping requirements 3. Familiarization with the regulatory requirements 5. Pan activities 12 1 12 0 c. Implement activities 12 1 12 0 d. Maintain record system for material used 2 1 1 2 0 e. Time to enter information i. Material usage ^c ii. Compliance calculation ^h 2 12 24 0 f. Time to train personnel 10 1 10 1 10 0 g. Store, file, and maintain records ^c 2 12 24 0 h. Retrieve records/reports ^d 1 12 12 12 0 i. Revise record systems due to SSM revisions ^h 8 1 8 0 Subtotal for Recordkeeping Requirements 7 total Labor Burden and Cost (rounded) ^m Total Capital and O&M Cost (rounded) ^m Total Capital and O&M Cost (rounded) ^m	a. Familiarization with the regulatory requirements	4	1	4	0
i. Add-on control performance test c 30 1 30 0 0 ii. Repeat add-on control performance test c 30 1 30 0 0 d. Write reports i. Initial notification	b. Process/review information	4	4	16	0
ii. Repeat add-on control performance test c	c. Required activities				
d. Write reports i. Initial notification ii. Notification of compliance status iii. Notification of compliance status iii. Notification of construction/ reconstruction 2	i. Add-on control performance test ^c	30	1	30	0
i. Initial notification	ii. Repeat add-on control performance test ^c	30	1	30	0
ii. Notification of compliance status iii. Notification of construction/ reconstruction iv. Notification of actual startup v. Notification of initial performance test/add-on control performance test est est est est est est est est e	d. Write reports				
iii. Notification of construction/ reconstruction iv. Notification of actual startup 2 1 2 0 v. Notification of initial performance test/add-on control performance test cd 2 1 2 0 vi. Report of initial performance test/add-on control performance test cd 2 1 2 0 vii. Semiannual report e 6 2 12 0 viii. Semiannual report e 6 2 12 0 viii. Excess emissions report 2 2 4 0 ix. Startup, shutdown, malfunction report e 2 1 2 0 Subtotal for Reporting Requirements 2. Recordkeeping requirements a. Familiarization with the regulatory requirements See 1.a. 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 e 0.5 365 182.5 0 ii. Compliance calculation e 2 12 24 0 f. Time to train personnel 10 1 10 0 g. Store, file, and maintain records e 1 12 12 12 12 13 12 14 15 15 15 15 15 15 15 15 15 15 15 15 15	i. Initial notification	2	1	2	0
iv. Notification of actual startup v. Notification of initial performance test/add-on control performance tests cd vi. Report of initial performance test/add-on control performance test cd vi. Report of initial performance test/add-on control performance test cdd vii. Report of initial performance test/add-on control performance test cdd 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 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 f ii. Compliance calculation h 2 12 24 0 f. Time to train personnel g. Store, file, and maintain records 1 1 12 12 10 i. Retrieve records/reports 1 i. Retrieve records/reports 1 i. Retrieve records/reports 1 j. Revise record systems due to SSM revisions 1 s. 1 8 0 j. Become familiar with CEDRI for electronic filing of notifications and reports 1 Total Labor Burden and Cost (rounded) m Total Capital and O&M Cost (rounded) m Total Capital and O&M Cost (rounded) m	ii. Notification of compliance status	2	1	2	0
v. Notification of initial performance test/add-on control performance test cd 2 1 2 0 0 vi. Report of initial performance test/add-on control performance test cd 2 1 1 1 10 0 0 vii. Semiannual report cd 6 2 12 0 0 viii. Semiannual report cd 6 2 12 0 0 viii. Excess emissions report 2 2 2 4 0 0 ix. Startup, shutdown, malfunction report cd 2 1 2 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0	iii. Notification of construction/ reconstruction	2	1	2	0
control performance test c-d vi. Report of initial performance test/add-on control performance test c-d vii. Semiannual report ° 6 2 12 0 viii. Excess emissions report 2 2 2 4 0 ix. Startup, shutdown, malfunction report 2 1 2 0 Subtotal for Reporting Requirements 2. Recordkeeping requirements a. Familiarization with the regulatory requirements	iv. Notification of actual startup	2	1	2	0
performance test s.d vii. Semiannual report s 6 2 12 0 viii. Excess emissions report 2 2 2 4 0 ix. Startup, shutdown, malfunction report s 2 1 2 0 0 Subtotal for Reporting Requirements 2. Recordkeeping requirements 3 See 1.a. 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 s 0.5 365 182.5 0 ii. Compliance calculation b 2 12 24 0 f. Time to train personnel 10 1 10 0 g. Store, file, and maintain records systems due to SSM revisions s 8 1 8 0 j. Become familiar with CEDRI for electronic filing of notifications and reports s 10 sile to make the material sed 10 subtotal for Recordkeeping Requirements 10 Total Labor Burden and Cost (rounded) m 10 Total Capital and O&M Cost (rounded) m 10 Total Capital and O&M Cost (rounded) m 10 Total Capital and O&M Cost (rounded) m		2	1	2	0
viii. Excess emissions report 2 2 4 0 ix. Startup, shutdown, malfunction report ¹ 2 1 2 0 Subtotal for Reporting Requirements 2. Recordkeeping requirements 8 2 1 2 0 a. Familiarization with the regulatory requirements See 1.a. 8 0 1 1 0 0 </td <td>vi. Report of initial performance test/add-on control performance test ^{c,d}</td> <td>10</td> <td>1</td> <td>10</td> <td>0</td>	vi. Report of initial performance test/add-on control performance test ^{c,d}	10	1	10	0
ix. Startup, shutdown, malfunction report ^f 2 1 2 0 Subtotal for Reporting Requirements 2. Recordkeeping requirements a. Familiarization with the regulatory requirements b. Plan activities 12 1 12 0 c. Implement activities 12 1 12 0 d. Maintain record system for material used 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 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 Subtotal for Recordkeeping Requirements Total Labor Burden and Cost (rounded) ^m Total Capital and O&M Cost (rounded) ^m	vii. Semiannual report ^e	6	2	12	0
Subtotal for Reporting Requirements 2. Recordkeeping requirements a. Familiarization with the regulatory requirements 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 Subtotal for Recordkeeping Requirements Total Labor Burden and Cost (rounded) ^m Total Capital and O&M Cost (rounded) ^m	viii. Excess emissions report	2	2	4	0
2. Recordkeeping requirements a. Familiarization with the regulatory requirements 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 3 0.5 365 182.5 0 ii. Compliance calculation h 2 12 12 24 0 f. Time to train personnel 10 1 10 0 g. Store, file, and maintain records i 1 1 1 1 1 1 0 0 i. Retrieve records/reports i 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	ix. Startup, shutdown, malfunction report ^f	2	1	2	0
a. Familiarization with the regulatory requirements 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 g. Store, file, and maintain records i h. Retrieve records/reports i i. Revise record systems due to SSM revisions k g. Become familiar with CEDRI for electronic filing of notifications and reports i Subtotal for Recordkeeping Requirements Total Labor Burden and Cost (rounded) m Total Capital and O&M Cost (rounded) m	Subtotal for Reporting Requirements				
b. Plan activities	2. Recordkeeping requirements				
c. Implement activities d. Maintain record system for material used 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 h 2 12 24 0 h. Retrieve records/reports h 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 h 8 1 8 0 Subtotal for Recordkeeping Requirements Total Labor Burden and Cost (rounded) m Total Capital and O&M Cost (rounded) m	a. Familiarization with the regulatory requirements	See 1.a.			
d. Maintain record system for material used 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	b. Plan activities	12	1	12	0
e. Time to enter information i. Material usage g ii. Compliance calculation h 2 12 24 0 f. Time to train personnel 10 1 10 0 g. Store, file, and maintain records h h. Retrieve records/reports h i. Revise record systems due to SSM revisions k j. Become familiar with CEDRI for electronic filing of notifications and reports h Subtotal for Recordkeeping Requirements Total Labor Burden and Cost (rounded) m Total Capital and O&M Cost (rounded) m	c. Implement activities	12	1	12	0
i. Material usage g ii. Compliance calculation h 2 12 24 0 f. Time to train personnel g. Store, file, and maintain records i h. Retrieve records/reports j i. Revise record systems due to SSM revisions k j. Become familiar with CEDRI for electronic filing of notifications and reports i Subtotal for Recordkeeping Requirements Total Labor Burden and Cost (rounded) m Total Capital and O&M Cost (rounded) m	d. Maintain record system for material used	20	1	20	0
ii. Compliance calculation h 2 12 24 0 f. Time to train personnel g. Store, file, and maintain records i h. Retrieve records/reports j i. Revise record systems due to SSM revisions k j. Become familiar with CEDRI for electronic filing of notifications and reports i Subtotal for Recordkeeping Requirements Total Labor Burden and Cost (rounded) m Total Capital and O&M Cost (rounded) m	e. Time to enter information				
f. Time to train personnel g. Store, file, and maintain records i h. Retrieve records/reports j i. Revise record systems due to SSM revisions k j. Become familiar with CEDRI for electronic filing of notifications and reports i Subtotal for Recordkeeping Requirements Total Labor Burden and Cost (rounded) m Total Capital and O&M Cost (rounded) m	i. Material usage ^g	0.5	365	182.5	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 i 8 1 8 0 Subtotal for Recordkeeping Requirements Total Labor Burden and Cost (rounded) m Total Capital and O&M Cost (rounded) m	ii. Compliance calculation h	2	12	24	0
h. Retrieve records/reports ^j 1 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	f. Time to train personnel	10	1	10	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 1 8 1 8 0 Subtotal for Recordkeeping Requirements Total Labor Burden and Cost (rounded) m Total Capital and O&M Cost (rounded) m	g. Store, file, and maintain records ⁱ	2	12	24	0
j. Become familiar with CEDRI for electronic filing of notifications and reports 1 8 0 Subtotal for Recordkeeping Requirements Total Labor Burden and Cost (rounded) m Total Capital and O&M Cost (rounded) m	h. Retrieve records/reports ^j	1	12	12	0
notifications and reports ¹ Subtotal for Recordkeeping Requirements Total Labor Burden and Cost (rounded) ^m Total Capital and O&M Cost (rounded) ^m	i. Revise record systems due to SSM revisions k	8	1	8	0
Total Labor Burden and Cost (rounded) ^m Total Capital and O&M Cost (rounded) ^m		8	1	8	0
Total Labor Burden and Cost (rounded) ^m Total Capital and O&M Cost (rounded) ^m	Subtotal for Recordkeeping Requirements				
	Total Labor Burden and Cost (rounded) ^m				
	Total Capital and O&M Cost (rounded) ^m				
	Grand Total (rounded) ^m				

- ^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 acc by private industry.
- ^c The performance test requirement will affect 3 facilities with add-on controls in the third year. The emission units whave a testing requirement in their permits. We assume a 5% failure and re-test rate ($3 \times 0.05 = 0.15$). Since the fraction 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 o
- ^g We assumed that each respondent will take 0.5 hours each day to enter daily records of mass fraction of organic HA 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
- 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.

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(E) Technical person hrs per year (E=CxD)	(F) Manage- ment 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	0	th o
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0 \$0
0	0	U	20
0	0	0	\$0
			Ψ0
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
	0		\$0
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
	0		\$0
	0		\$0
			\$0
			\$0

Labor 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

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-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	See 1.a.				
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 ¹	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					

- ^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 acc by private industry.
- ^c The performance test requirement will affect 3 facilities with add-on controls in the third year. The emission units whave a testing requirement in their permits. We assume a 5% failure and re-test rate ($3 \times 0.05 = 0.15$). Since the fraction re-tests will be done.
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- ^g We assumed that each respondent will take 0.5 hours each day to enter daily records of mass fraction of organic HA 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
- ¹ 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.

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(E) Technical person hrs per year (E=CxD)	(F) Manage- ment 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	
90	4.5	9.0	\$11,789.28
0	0	0	\$0
	0	0	φo
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	
	145		\$16,500
			\$57,000
			\$73,500
	<u> </u>	l	ψ, υ, υ υ

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

-year period of this ICR.

nce 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 at (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 respondent.

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 Product 63, Subpart PPPP) (Amendments)

Year 1

Burden Item	_	(B) Number of occurrences per year		(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					

- ^a We estimate that 125 existing sources will be subject to the rule over the three-year period of this ICR, and no n
- ^b This cost is based on the following labor rates which incorporates a 1.6 benefits multiplication factor to account 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
- ^c We assume it will take 24 hours to complete the initial performance test review. Assume a 5% failure and re-test
- ^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 ($3 \times 0.05 = 0.15$). Since the fraction of re-tests (0.15) rounds down
- ^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.
- ^gTotals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

ts 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
0	0	\$0
0	0	\$0
0	0	\$0
0	0	\$0
0	0	\$0
0		\$0

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 Product 63, Subpart PPPP) (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					

- ^a We estimate that 125 existing sources will be subject to the rule over the three-year period of this ICR, and no n
- ^b This cost is based on the following labor rates which incorporates a 1.6 benefits multiplication factor to account 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
- ^c We assume it will take 24 hours to complete the initial performance test review. Assume a 5% failure and re-test
- ^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 ($3 \times 0.05 = 0.15$). Since the fraction of re-tests (0.15) rounds down
- ^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.
- ^gTotals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

ts 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
0	0	\$0
0	0	\$0
0	0	\$0
0	0	\$0
0	0	\$0
0		\$0

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

Year 3

Burden Item	_	(B) Number of occurrences per year	l	(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				_	

^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

 $^{^{\}rm c}$ We assume it will take 24 hours to complete the initial performance test review. Assume a 5% failure and re-test ra

^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.

s 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		

w sources will become subject.

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

ate.

the emission units with add-on controls in 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:

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)	(B)	(C)	(D)	(E)
Performance Testing	Capital Startup Cost for One Performance Test	Number of Respondents Doing Testing	Startin (oct	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 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 Are Also New Respondents	
1	0	125	0	0	
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

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

\$57,000

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