

Table 1a: Annual Respondent Burden and Cost - NESHAP for Shipbuilding and Ship Repair Facilities - Su

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 ^a
1. Applications	N/A			
2. Survey and Studies	N/A			
3. Reporting Requirements				
a. Familiarization with Regulatory Requirements	1	1	1	50
b. Required Activities	See 3e			
c. Create Information	See 3e			
d. Gather Existing Information	See 3e			
e. Write Report				
Notification of Construction/Reconstruction ^c	2	1	2	0
Notification of Demonstration of CMS ^c	N/A			
Report of Performance Test ^c	N/A			
Initial Notification and Implementation ^c	14	1	14	0
Semiannual Notification of Compliance Status	8	2	16	50
Subtotal for Reporting Requirements				
4. Recordkeeping Requirements				
a. Familiarization with Regulatory Requirements	See 3a			
b. Plan Activities	N/A			
c. Implement Activities	8	50	400	50
d. Develop Record System ^c	8	1	8	0
e. Train Personnel	28	1	28	50
g. Audits	N/A			
Subtotal for Recordkeeping Requirements				
TOTAL LABOR BURDEN AND COST (rounded)^d				
TOTAL CAPITAL AND O&M COST (rounded)^d				
GRAND TOTAL (rounded)^d				

Assumptions:

a Number of affected facilities per year is 56. We assume 90 percent of sources are in the private sector, or approximately 50 respondents over the three-year period of this ICR. We assume that each respondent will have to familiarize with the regulatory requirements each year.

b This ICR uses the following labor rates: \$148.45 per hour for Executive, Administrative, and Managerial labor; \$121.46 per hour for other labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, March 2020, Table 2, Civilian Workers from column 1, Total Compensation. The rates have been increased by 110 percent to account for the benefit packages available to workers.

c We have assumed this is a one-time-only cost.

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

Surface Coating (40 CFR Part 63, Subpart II) (Renewal)(Private Sector)

(E) Technical person- hours per year (E=CxD)	(F) Management person hours per year (Ex0.05)	(G) Clerical person hours per year (Ex0.1)	(H) Total Cost per year _b
121.46	148.45	60.23	
50	2.5	5	\$6,745.28
0	0	0	\$0
0	0	0	\$0
800	40	80	\$107,924.40
978			\$114,670
20,000	1,000	2,000	\$2,698,110.00
0	0	0	\$0
1,400	70	140	\$188,867.70
24,610			\$2,886,978
25,600			\$3,000,000
			\$0
25,600			\$3,000,000

...ondents. We have assumed that there will be no new growth each year.

...r for Technical labor, and \$60.23 per hour for Clerical workers, by occupational and industry group. The rates are ... those employed by private industry.

Table 1b: Annual Respondent Burden and Cost - NESHAP for Shipbuilding and Ship Repair Facilities - Su

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 ^a
1. Applications	N/A			
2. Survey and Studies	N/A			
3. Reporting Requirements				
a. Familiarization with Regulatory Requirements	1	1	1	6
b. Required Activities	See 3e			
c. Create Information	See 3e			
d. Gather Existing Information	See 3e			
e. Write Report				
Notification of Construction/Reconstruction ^c	2	1	2	0
Notification of Demonstration of CMS ^c	N/A			
Report of Performance Test ^c	N/A			
Initial Notification and Implementation ^c	14	1	14	0
Semiannual Notification of Compliance Status	8	2	16	6
Subtotal for Reporting Requirements				
4. Recordkeeping Requirements				
a. Familiarization with Regulatory Requirements	See 3a			
b. Plan Activities	N/A			
c. Implement Activities	8	50	400	6
d. Develop Record System ^c	8	1	8	0
e. Train Personnel	28	1	28	6
g. Audits	N/A			
Subtotal for Recordkeeping Requirements				
TOTAL LABOR BURDEN AND COST (rounded)^d				
TOTAL CAPITAL AND O&M COST (rounded)^d				
GRAND TOTAL (rounded)^d				

Assumptions:

a Number of affected facilities per year is 56. We assume 10 percent of sources are in the public sector, or approximately 6 respon over the three-year period of this ICR. We assume that each respondent will have to familiarize with the regulatory requirements e

b This cost is based on the following hourly labor rates times a 1.6 benefits multiplication factor to account for government overhe \$42.73 x 1.6), \$50.72 for Technical (GS-12, Step 1, \$31.70 x 1.6) and \$27.46 Clerical (GS-6, Step 3, \$17.16 x 1.6). These rates ar General Schedule" which excludes locality rates of pay.

c We have assumed this is a one-time-only cost.

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

Surface Coating (40 CFR Part 63, Subpart II) (Renewal)(Public Sector)

50.72		68.37		27.46	
(E) Technical person- hours per year (E=CxD)	(F) Management person hours per year (Ex0.05)	(G) Clerical person hours per year (Ex0.1)	(H) Total Cost per year _b		
6	0.3	0.6			\$341.31
0	0	0			\$0
0	0	0			\$0
96	4.8	9.6			\$5,460.91
117					\$5,802
2,400	120	240			\$136,522.80
0	0	0			\$0
168	8.4	16.8			\$9,556.60
2,953					\$146,079
3,100					\$150,000
					\$0
3,100					\$150,000

...dents. We have assumed that there will be no new growth each year.

...ad expenses: \$68.37 for Managerial (GS-13, Step 5, ...e from the Office of Personnel Management (OPM) "2020

Table 1c: Annual Respondent Burden and Cost Breakdown by Affected Sector- NESHAP for Shipbuilding and

Affected Sector	Number of Responses	Labor Hours			Labor Cost
		Reporting	Recordkeeping	Total	
Private	50	978	24,610	25,600	\$3,000,000
Public (Federal)	6	117	2,953	3,070	\$150,000
Total ^a	56	1,100		28,700	\$3,200,000

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

1 Ship Repair Facilities - Surface Coating (40 CFR Part 63, Subpart II) (Renewal)

Capital and O&M Cost
\$0
\$0
<i>\$0</i>

hrs/response

Table 2: Average Annual EPA Burden and Cost – NESHAP for Shipbuilding and Ship Repair Facilities - Surface C

Activity	(A) EPA person-hours per occurrence	(B) No. of occurrences per plant per year	(C) EPA person hours per plant per year (AxB)
Initial Performance Tests ^c	N/A		
Repeat Performance Test	N/A		
Report Review			
Notification of Construction ^c	2	1	2
Review of Initial Notification and Implementation Plan ^c	2	1	2
Review of Semiannual Notification of Compliance Status	2	2	4
TOTAL ANNUAL BURDEN AND COST (rounded)^d			

Assumptions:

a Number of affected facilities per year is 56.

b This cost is based on the following hourly labor rates times a 1.6 benefits multiplication factor to account for government overhead e: Technical (GS-12, Step 1, \$31.70 x 1.6) and \$27.46 Clerical (GS-6, Step 3, \$17.16 x 1.6). These rates are from the Office of Personnel rates of pay.

c We have assumed this is a one-time-only cost.

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

loading (40 CFR Part 63, Subpart II) (Renewal)

	50.72	68.37	27.46	
(D) Plants per year ^a	(E) Technical person-hours per year (Cx _D)	(F) Management person-hours per year (Ex _{0.05})	(G) Clerical person-hours per year (Ex _{0.1})	(H) Cost, \$ ^b
0	0	0	0	\$0
0	0	0	0	\$0
56	224	11.2	22.4	\$12,742
	258			\$12,700

Expenses: \$68.37 for Managerial (GS-13, Step 5, \$42.73 x 1.6), \$50.72 for Management (OPM) "2020 General Schedule" which excludes locality