

Table 1: Annual Respondent Burden and Cost (Year 1) – National Volatile Organic Compound CFR Part 59, Subpart E) (Renewal)

Burden item	(A) Person hours per occurrence	(B) No. of occurrences per respondent per year	(C) Person hours per respondent per year (C = A x B)	(D) Respondents per year ^a
1. Applications	N/A			
2. Survey and Studies	N/A			
3. Reporting requirements				
A. Familiarization with rule requirements				
New sources	4	1	4	1
Existing sources ^c	1	1	1	65
B. Gather information	4	1	4	1
C. Write Report				
Initial report (including small quantity manufacturers) ^d	25.3	1	25.3	1
Supplemental report ^e	4	1	4	66
Variance or compliance extension application ^f	24	1	24	0.1
Respond to the EPA request for data ^g	60	1	60	10
Subtotal for Reporting Requirements				
4. Recordkeeping requirements				
A. Familiarization with rule requirements	See 3A			
B. Plan activities	16	1	16	1
C. Calculation of reactivity ^{h, i, j}	0.5	37	18.5	11
D. Maintenance of batch information ^k	0.25	481	120	66
Subtotal for Recordkeeping Requirements				
Total Labor Burden and Costs (rounded) ^k				
Total Capital and O&M Cost (rounded) ^k				
GRAND TOTAL (rounded) ^k				

Assumptions:

- ^a We have assumed 65 existing respondents in year 1 and one additional new aerosol coating manufacturer each year.
- ^b This ICR uses the following labor rates: \$126.95 (managerial), \$71.38 (technical), and \$45.23 (clerical). These rates are based on Labor Statistics, May 2020 National Occupational Employment and Wage Estimates, for occupational groups 11-1021. These rates represent the mean hourly wage, and have been increased by 110 percent to account for the benefit packages available.
- ^c We have assumed that each existing source will re-familiarize with the requirements each year.
- ^d New sources file initial reports in their first year.
- ^e We assume each new and existing respondent will have one incident per year that will require supplemental reporting.
- ^f We assume that 10 percent of new respondents will request a variance or extension on their compliance application.
- ^g We assume that 15 percent of new and existing sources per year will be required to respond to enforcement questions.
- ^h We assume that the time required (0.5 hours) for the calculation of reactivity for formulations for new coating categories.
- ⁱ We assume each respondent will maintain records on 37 formulations (average for industry).
- ^j The number of respondents includes one new and 10 existing respondents. We have assumed that 10 existing manufacturers.

^k We have assumed that it takes the same amount of time (0.25 hours) for new and existing sources to maintain batch i

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

and Emission Standards for Aerosol Coatings (40

(E) Technical person- hours per year (E = C x D)	(F) Management person hours per year (E x 0.05)	(G) Clerical person hours per year (E x 0.1)	(H) Total Cost Per year ^b
4	0.2	0.4	\$329.00
65	3.3	6.5	\$5,346.23
4	0.2	0.4	\$329.00
25.3	1.26	2.53	\$2,076.80
264	13.2	26.4	\$21,713.91
2.4	0.12	0.24	\$197.40
600	30	60	\$49,349.79
1,109			\$79,342
16	1	2	\$1,315.99
204	10	20	\$16,737.80
7,937	397	794	\$652,774.35
9,379			\$670,828
10,500			\$750,000
			\$0
			\$750,000

Labor Rates	
Management	\$126.95
Technical	\$71.38
Clerical	\$45.23

Note to EPA: We have accounted for ti

are from the United States Department of Labor, Bureau of (managerial), 51-8090 (technical), and 43-6010 (clerical). The able to those employed by private industry.

g (also referred to as a “notice of change” report).

; or other agency requests for information.

ries is the same for new sources and existing sources.

cturers add new coating categories each year.

nformation.

me for existing respondents to refamiliarize with the rule requirements, a standard in most CAA ICRs.

Table 2: Annual Respondent Burden and Cost (Year 2) – National Volatile Organic Compound CFR Part 59, Subpart E) (Renewal)

Burden item	(A) Person hours per occurrence	(B) No. of occurrences per respondent per year	(C) Person hours per respondent per year (C = A x B)	(D) Respondents per year ^a
1. Applications	N/A			
2. Survey and Studies	N/A			
3. Reporting requirements				
A. Familiarization with rule requirements				
New sources	4	1	4	1
Existing sources ^c	1	1	1	66
B. Gather information	4	1	4	1
C. Write Report				
Initial report (including small quantity manufacturers) ^d	25.3	1	25.3	1
Supplemental report ^e	4	1	4	67
Variance or compliance extension application ^f	24	1	24	0.1
Respond to the EPA request for data ^g	60	1	60	10
Subtotal for Reporting Requirements				
4. Recordkeeping requirements				
A. Familiarization with rule requirements	See 3A			
B. Plan activities	16	1	16	1
C. Calculation of reactivity ^{h, i, j}	0.5	37	18.5	11
D. Maintenance of batch information ^k	0.25	481	120	67
Subtotal for Recordkeeping Requirements				
Total Labor Burden and Costs (rounded) ^k				
Total Capital and O&M Cost (rounded) ^k				
GRAND TOTAL (rounded) ^k				

Assumptions:

- ^a We have assumed 66 existing respondents in year 2 and one additional new aerosol coating manufacturer each year.
- ^b This ICR uses the following labor rates: \$126.95 (managerial), \$71.38 (technical), and \$45.23 (clerical). These rates are based on Labor Statistics, May 2020 National Occupational Employment and Wage Estimates, for occupational groups 11-1021. These rates represent the mean hourly wage, and have been increased by 110 percent to account for the benefit packages available.
- ^c We have assumed that each existing source will re-familiarize with the requirements each year.
- ^d New sources file initial reports in their first year.
- ^e We assume each new and existing respondent will have one incident per year that will require supplemental reporting.
- ^f We assume that 10 percent of new respondents will request a variance or extension on their compliance application.
- ^g We assume that 15 percent of new and existing sources per year will be required to respond to enforcement questions.
- ^h We assume that the time required (0.5 hours) for the calculation of reactivity for formulations for new coating categories.
- ⁱ We assume each respondent will maintain records on 37 formulations (average for industry).
- ^j The number of respondents includes one new and 10 existing respondents. We have assumed that 10 existing manufacturers.

^k We have assumed that it takes the same amount of time (0.25 hours) for new and existing sources to maintain batch i

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

and Emission Standards for Aerosol Coatings (40

(E) Technical person- hours per year (E = C x D)	(F) Management person hours per year (E x 0.05)	(G) Clerical person hours per year (E x 0.1)	(H) Total Cost Per year ^b
4	0.2	0.4	\$329.00
66	3.3	6.6	\$5,428.48
4	0.2	0.4	\$329.00
25.3	1.26	2.53	\$2,076.80
268	13.4	26.8	\$22,042.91
2.4	0.12	0.24	\$197.40
600	30	60	\$49,349.79
1,115			\$79,753
16	1	2	\$1,315.99
204	10	20	\$16,737.80
8,057	403	806	\$662,664.87
9,518			\$680,719
10,600			\$760,000
			\$0
			\$760,000

Labor Rates	
Management	\$126.95
Technical	\$71.38
Clerical	\$45.23

Note to EPA: We have accounted for ti

are from the United States Department of Labor, Bureau of (managerial), 51-8090 (technical), and 43-6010 (clerical). The able to those employed by private industry.

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Table 3: Annual Respondent Burden and Cost (Year 3) – National Volatile Organic Compound CFR Part 59, Subpart E) (Renewal)

Burden item	(A) Person hours per occurrence	(B) No. of occurrences per respondent per year	(C) Person hours per respondent per year (C = A x B)	(D) Respondents per year ^a
1. Applications	N/A			
2. Survey and Studies	N/A			
3. Reporting requirements				
A. Familiarization with rule requirements				
New sources	4	1	4	1
Existing sources ^c	1	1	1	67
B. Gather information	4	1	4	1
C. Write Report				
Initial report (including small quantity manufacturers) ^d	25.3	1	25.3	1
Supplemental report ^e	4	1	4	68
Variance or compliance extension application ^f	24	1	24	0.1
Respond to the EPA request for data ^g	60	1	60	10
D. Write Triennial Report ^h				
Establish account for NEI	2	1	2	68
Enter general information into database	0.5	1	0.5	68
Enter product formulations into database	0.25	37	9.25	68
Enter company-wide volumes of coating constituents into database	2	1	2	68
Subtotal for Reporting Requirements				
4. Recordkeeping requirements				
A. Familiarization with rule requirements	See 3A			
B. Plan activities	16	1	16	1
C. Calculation of reactivity ^{i, j, k}	0.5	37	18.5	11
D. Maintenance of batch information ^l	0.25	481	120	68
E. Triennial Report				
Calculate company-wide volume usage of coating constituents ^m	56	1	56	68
QA/QC and review ⁿ	40	1	40	68
Read instructions/take training for reporting	4	1	4	68
Subtotal for Recordkeeping Requirements				
Total Labor Burden and Costs (rounded) ^o				
Total Capital and O&M Cost (rounded) ^o				
GRAND TOTAL (rounded) ^o				

Assumptions:

^a We have assumed 67 existing respondents in year 3 and one additional new aerosol coating manufacturer each year.

- ^b This ICR uses the following labor rates: \$126.95 (managerial), \$71.38 (technical), and \$45.23 (clerical). These rates are based on Labor Statistics, May 2020 National Occupational Employment and Wage Estimates, for occupational groups 11-1021. These rates represent the mean hourly wage, and have been increased by 110 percent to account for the benefit packages available.
- ^c We have assumed that each existing source will re-familiarize with the requirements each year.
- ^d New sources file initial reports in their first year.
- ^e We assume each new and existing respondent will have one incident per year that will require supplemental reporting.
- ^f We assume that 10 percent of new respondents will request a variance or extension on their compliance application.
- ^g We assume that 15 percent of new and existing sources per year will be required to respond to enforcement questions.
- ^h We assume each respondent will submit a triennial report of formulations and VOC usage.
- ⁱ We assume that the time required (0.5 hours) for the calculation of reactivity for formulations for new coating categories.
- ^j We assume each respondent will maintain records on 37 formulations (average for industry).
- ^k The number of respondents includes one new and 10 existing respondents. We have assumed that 10 existing manufacturers.
- ^l We have assumed that it takes the same amount of time (0.25 hours) for new and existing sources to maintain batch information.
- ^m We have assumed that it takes 16 hours to gather information and an additional 40 hours to perform calculations. We assume that 20 facilities are used by each facility and that it takes 2 hours to sum the information for each constituent. $(16 + (20 \times 2) = 56)$
- ⁿ We have assumed that the Triennial report undergoes QA/QC and review prior to submittal to EPA.
- ^o Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

and Emission Standards for Aerosol Coatings (40

(E) Technical person- hours per year (E = C x D)	(F) Management person hours per year (E x 0.05)	(G) Clerical person hours per year (E x 0.1)	(H) Total Cost Per year ^b
4	0.2	0.4	\$329.00
67	3.4	6.7	\$5,510.73
4	0.2	0.4	\$329.00
25.3	1.26	2.53	\$2,076.80
272	13.6	27.2	\$22,371.90
2.4	0.12	0.24	\$197.40
600	30	60	\$49,349.79
136	6.8	13.6	\$11,185.95
34	1.7	3.4	\$2,796.49
629	31.45	62.9	\$51,735.03
136	6.8	13.6	\$11,185.95
2,196			\$157,068
16	1	2	\$1,315.99
204	10	20	\$16,737.80
8,177	409	818	\$672,555.39
3,808	190	381	\$313,206.67
2,720	136	272	\$223,719.05
272	14	27	\$22,371.90
17,476			\$1,249,907
19,700			\$1,410,000
			\$0
			\$1,410,000

Labor Rates	
Management	\$126.95
Technical	\$71.38
Clerical	\$45.23

Note to EPA: We have accounted for ti

are from the United States Department of Labor, Bureau of (managerial), 51-8090 (technical), and 43-6010 (clerical). The able to those employed by private industry.

§ (also referred to as a “notice of change” report).

; or other agency requests for information.

ries is the same for new sources and existing sources.

cturers add new coating categories each year.

formation.

: have assumed that an average of 20 different constituents are

me for existing respondents to refamiliarize with the rule requirements, a standard in most CAA ICRs.

Table 4: Annual EPA Burden and Cost (Year 1) - National Volatile Organic Compound Subpart E) (Renewal)

Activity	(A)	(B)	(C)
	EPA person-hours per occurrence	No. of occurrences per plant per year	EPA person-hours per plant per year (C=AxB)
1. Initial report ^c	8	1	8
2. Supplemental report ^d	4	1	4
3. Variance application ^e	16	1	16
4. Supplemental data request ^f	40	1	40
TOTAL (rounded) ^g			

Assumptions:

- ^a We have assumed 65 existing respondents in year 1 and one additional new aerosol coating manufacturer ea
- ^b This ICR uses the following labor rates: \$69.04 (managerial), \$51.23 (technical), and \$27.73 (clerical). The Schedule, which excludes locality rates of pay. The rates have been increased by 60 percent to account for the
- ^c We have assumed that it will take eight hours for the Agency to review the initial report filed by new source:
- ^d We have assumed that it will take four hours for the Agency to review to review the supplemental reports.
- ^e We have assumed that it will take sixteen hours for the Agency to review requests for variances or extension
- ^f We assume that EPA will request additional data from 15 percent of new and existing sources regarding enforcement hours to review this data.
- ^g Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

and Emission Standards for Aerosol Coatings (40 CFR Part 59,

(D)	(E)	(F)	(G)	(H)
Number of occurrences per respondent per year ^a	Technical person- hours per year (E=CxD)	Management person-hours per year (Ex0.05)	Clerical person-hours per year (Ex0.1)	Cost, \$ ^b
1	8	0.4	0.8	\$459.64
66	264	13.2	26.4	\$15,168.12
0.1	1.6	0.08	0.16	\$91.93
10	400	20	40	\$22,982.00
		775		\$38,700

Labor Rates	
Management	\$69.04
Technical	\$51.23
Clerical	\$27.73

ch year.

se rates are from the Office of Personnel Management (OPM), 2021 General
: benefit packages available to government employees.

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is filed by new sources on their compliance application.

orcement questions or other agency requests for information, and that it will take 40

**Table 5: Annual EPA Burden and Cost (Year 2) - National Volatile Organic Compound Emission St
Subpart E) (Renewal)**

Activity	(A)	(B)	(C)	(D)
	EPA person-hours per occurrence	No. of occurrences per plant per year	EPA person-hours per plant per year (C=AxB)	Number of occurrences per respondent per year ^a
1. Initial report ^c	8	1	8	1
2. Supplemental report ^d	4	1	4	67
3. Variance application ^e	16	1	16	0.1
4. Supplemental data request ^f	40	1	40	10
TOTAL (rounded) ^g				

Assumptions:

- ^a We have assumed 66 existing respondents in year 2 and one additional new aerosol coating manufacturer each year.
- ^b This ICR uses the following labor rates: \$69.04 (managerial), \$51.23 (technical), and \$27.73 (clerical). These rates are from 1 Schedule, which excludes locality rates of pay. The rates have been increased by 60 percent to account for the benefit packages
- ^c We have assumed that it will take eight hours for the Agency to review the initial report filed by new sources.
- ^d We have assumed that it will take four hours for the Agency to review to review the supplemental reports.
- ^e We have assumed that it will take sixteen hours for the Agency to review requests for variances or extensions filed by new so
- ^f We assume that EPA will request additional data from 15 percent of new and existing sources regarding enforcement question hours to review this data.
- ^g Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

Standards for Aerosol Coatings (40 CFR Part 59,

(E)	(F)	(G)	(H)
Technical person- hours per year (E=CxD)	Management person-hours per year (Ex0.05)	Clerical person-hours per year (Ex0.1)	Cost, \$^b
8	0.4	0.8	\$459.64
268	13.4	26.8	\$15,397.94
1.6	0.08	0.16	\$91.93
400	20	40	\$22,982.00
779			\$38,900

Labor Rates	
Management	\$69.04
Technical	\$51.23
Clerical	\$27.73

the Office of Personnel Management (OPM), 2021 General ; available to government employees.

urces on their compliance application.

is or other agency requests for information, and that it will take 40

Table 6: Annual EPA Burden and Cost (Year 3) - National Volatile Organic Compound Subpart E) (Renewal)

Activity	(A)	(B)	(C)
	EPA person-hours per occurrence	No. of occurrences per plant per year	EPA person-hours per plant per year (C=AxB)
1. Initial report ^c	8	1	8
2. Supplemental report ^d	4	1	4
3. Variance application ^e	16	1	16
4. Supplemental data request ^f	40	1	40
5. Triennial Report ^g			
A. Develop Database and Report Forms	300	1	300
B. Populate Database	12	1	12
C. QA/Review Data	600	1	600
TOTAL (rounded) ^h			

Assumptions:

^a We have assumed 67 existing respondents in year 3 and one additional new aerosol coating manufacturer each

^b This ICR uses the following labor rates: \$69.04 (managerial), \$51.23 (technical), and \$27.73 (clerical). These which excludes locality rates of pay. The rates have been increased by 60 percent to account for the benefit pack

^c We have assumed that it will take eight hours for the Agency to review the initial report filed by new sources.

^d We have assumed that it will take four hours for the Agency to review to review the supplemental reports.

^e We have assumed that it will take sixteen hours for the Agency to review requests for variances or extensions

^f We assume that EPA will request additional data from 15 percent of new and existing sources regarding enforcement hours to review this data.

^g Each respondent is required to submit a report of formulations and VOC usage once every three years. We assume submissions from all respondents, populate the database, and then perform a QA and review of the data in year 3

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

Emission Standards for Aerosol Coatings (40 CFR Part 59,

(D)	(E)	(F)	(G)	(H)
Number of occurrences per respondent per year ^a	Technical person- hours per year (E=CxD)	Management person-hours per year (Ex0.05)	Clerical person-hours per year (Ex0.1)	Cost, \$ ^b
1	8	0.4	0.8	\$459.64
68	272	13.6	27.2	\$15,627.76
0.1	1.6	0.08	0.16	\$91.93
10	400	20	40	\$22,982.00
1	300	15	30	\$17,236.50
68	816	41	82	\$46,883.28
1	600	30	60	\$34,473.00
	2,760			\$138,000

Labor R.
Management
Technical
Clerical

year.

rates are from the Office of Personnel Management (OPM), 2021 General Schedule, packages available to government employees.

filed by new sources on their compliance application.

comment questions or other agency requests for information, and that it will take 40

time EPA will develop/update the database and reporting forms, collect the data 3.

ates
\$69.04
\$51.23
\$27.73

Three Year Summary

Respondent Burden and Costs				
Year	Reporting Hours	Recordkeeping Hours	Total Hours	Reporting Costs
Year 1	1,109	9,379	10,489	\$79,342
Year 2	1,115	9,518	10,633	\$79,753
Year 3	2,196	17,476	19,672	\$157,068
Total	4,421	36,373	40,794	\$316,164
3-Year Average	1,474	12,124	13,598	\$105,388

Agency Burden and Costs

Year	Labor Hours	Labor Costs
Year 1	775	\$38,700
Year 2	779	\$38,900
Year 3	2,760	\$138,000
Total	4,314	\$215,600
3-Year Average	1,438	\$71,867

Average Hours per Response	80.6
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Recordkeeping Costs	Total Costs
\$670,828	\$750,170
\$680,719	\$760,472
\$1,249,907	\$1,406,975
\$2,601,454	\$2,917,617
\$867,151	\$972,539

Capital/Startup vs. Operation and Maintenance (O&M) Costs				
(A)	(B)	(C)	(D)	(E)
Continuous Monitoring Device	Capital/Startup Cost for One Respondent ^a	Number of New Respondents	Total Capital/Startup Cost, (B X C)	Annual O&M Costs for One Respondent ^a
Total			\$0	

No capital/startup and operation and maintenance costs are associated with this rulemaking.

Number of Respondents				
	Respondents That Submit Reports		Respondents That Do Not Submit Any Reports	
	(A)	(B)	(C)	(D)
Year	Number of New Respondents ^a	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	1	65	0	0
2	1	66	0	0
3	1	67	0	0
Average	1	66	0	0

Total Annual Responses				
(A)	(B)	(C)	(D)	(E)
Information Collection Activity	Number of Respondents	Number of Responses	Number of Existing Respondents That Keep Records But Do Not Submit Reports	Total Annual Responses E=(BxC)+D
Year 1				
Initial report	1	1	0	1
Supplemental report	66	1	0	66
Variance or compliance extension application	0.1	1	0	0.1

Respond to the EPA request for data	10	1	0	10
Year 2				
Initial report	1	1	0	1
Supplemental report	67	1	0	67
Variance or compliance extension application	0.1	1	0	0.1
Respond to the EPA request for data	10	1	0	10
Year 3				
Initial report	1	1	0	1
Supplemental report	68	1	0	68
Variance or compliance extension application	0.1	1	0	0.1
Respond to the EPA request for data	10	1	0	10
Establish account for NEI	68	1	0	68
Enter general information into database	68	1	0	68
Enter product formulations into database	68	1	0	68
Enter company wide volumes of coating constituents into database	68	1	0	68
			Total	506
			Average	169

(F)	(G)
Number of Respondents with O&M	Total O&M, (ExF)
	\$0

(E)
Number of Respondents (E=A+B+C-D)
66
67
68
67

Wages

Industry

U.S Bureau of Labor Statistics

May 2020 National Occupational Employment and Wage Estimates

https://www.bls.gov/oes/current/oes_nat.htm#00-0000

Labor Category	Occupational Code	Mean Wage Estimate (\$2020)	Loaded Wage (+110%) (\$2020)
Managerial	11-1021	\$60.45	\$126.95
Technical	51-8090	\$33.99	\$71.38
Clerical	43-6010	\$21.54	\$45.23

This ICR uses the following labor rates: \$126.95 (managerial), \$71.38 (technical), and \$45.23 (clerical). These rates are from Labor, Bureau of Labor Statistics, May 2020 National Occupational Employment and Wage Estimates, for occupational group 11-1021 (managerial), 51-8090 (technical), and 43-6010 (clerical). The rates represent the mean hourly wage, and have been increased by 110 percent to account for packages available to those employed by private industry.

Government

Labor Rates	
Management	\$69.04 (GS-13, Step 5, \$43.15 + 60%)
Technical	\$51.23 (GS-12, Step 1, \$32.02 + 60%)
Clerical	\$27.73 (GS-6, Step 3, \$17.33 + 60%)

This ICR uses the following labor rates: \$69.04 (managerial), \$51.23 (technical), and \$27.73 (clerical). These rates are from Management (OPM), 2021 General Schedule, which excludes locality rates of pay. The rates have been increased by 60 percent to account for packages available to government employees.

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ups 11-1021 (managerial), 51-8090
count for the benefit packages

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cent to account for the benefit