

Table 1: Annual Respondent Burden and Cost – NESHAP for Automobile and Light-duty T Subpart III) (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. Applications	N/A			
2. Survey and Studies	N/A			
3. Reporting Requirements				
a. Familiarization with the regulatory requirements	4	1	4	43
b. Required activities				
i. Initial performance test ^c	24	1	24	0
ii. Repeat performance test ^d	24	0.2	4.8	0
iii. Compile and process data ^e	4	4	16	0
iv. Add-on control performance test ^f	30	1	30	0
v. Repeat add-on control performance test ^f	30	1	30	0
c. 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 performance test/re-test ^{d,f}	2	1	2	0
vi. Report of performance test/re-test ^{d,f}	10	1	10	0
vii. Semiannual report ^g	6	2	12	0
viii. Excess emissions report ^h	2	2	4	0
ix. Startup, shutdown, malfunction report ⁱ	2	1	2	0
Subtotal for Reporting Requirements				
2. Recordkeeping requirements				
a. Familiarization with the regulatory requirements	4	1	4	0
b. Plan activities	12	1	12	0
c. Implement activities	12	1	12	0
d. Maintain record system for material used ^j	20	2	40	0
e. Time to enter information				
i. Material usage ^k	0.5	365	182.5	0
ii. Compliance calculation	2	12	24	0
f. Time to train personnel	10	1	10	0
g. Store, file, and maintain records ^l	2	12	24	0
h. Retrieve records/reports ^m	1	12	12	0
i. Revise record systems due to SSM revisions ⁿ	8	1	8	43
j. Become familiar with CEDRI for electronic filing of notifications and reports ^o	8	1	8	43

Subtotal for Recordkeeping Requirements				
Total Labor Burden and Cost (rounded) ^p				
Total Capital and O&M Cost (rounded) ^p				
Grand Total (rounded) ^p				

Assumptions:

- ^a We estimate that 43 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 ICR uses the following labor rates: \$147.40 per hour for Executive, Administrative, and Managerial labor; \$11.40 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 We assume it will take 24 hours to complete the initial performance test.
- ^d We assume 5 percent of respondents will need to repeat the performance test.
- ^e We assume each respondent will take four hours to compile and process data. This will occur four times per year.
- ^f The performance test requirement will affect 5 facilities in the third year. These facilities do not already have a test and re-test rate ($5 \times 0.05 = 0.25$). Since the fraction of re-tests (0.25) rounds down to zero, we assume no re-tests will occur.
- ^g We assume each respondent will take six hours to complete each semiannual report.
- ^h We assume each respondent will take two hours to complete excess emissions reports. This will occur two times per year.
- ⁱ We assume 25 percent of respondents will use add-on controls, and that each will take two hours per year to complete the recordkeeping requirements.
- ^j We assume it will take each respondent twenty hours to maintain the record system for materials used. This will occur once per year.
- ^k We assume each respondent will take 30 minutes to enter information on material usage. This will occur 365 times per year.
- ^l We assume it will take each respondent two hours to store, file, and maintain records. This will occur twelve times per year.
- ^m We assume it will take each respondent one hour to retrieve records or reports. This will occur twelve times per year.
- ⁿ We assume that costs associated with elimination of the SSM exemption include time for re-evaluating previously determined costs.
- ^o Responses in year one associated with the use of electronic reporting include becoming familiar with CEDRI and the reporting process.
- ^p Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

Crack Surface Coating (40 CFR Part 63,

(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
172	8.6	17.2	\$22,530.62
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
198			\$22,531
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
344	17.2	34.4	\$45,061.25
344	17.2	34.4	\$45,061.25

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

791			\$90,122
989			\$113,000
			\$0
			\$113,000

ources 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

ng requirement in their permits. We assume a 5% failure
be done.

r year.

te the startup, shutdown, malfunction report.

cur two times per year.

per year.

per year.

ir.

eveloped SSM record systems in year one.

e semi-annual reporting form.

Table 2: Annual Respondent Burden and Cost – NESHAP for Automobile and Light-duty T Subpart III) (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. Applications	N/A			
2. Survey and Studies	N/A			
3. Reporting Requirements				
a. Familiarization with the regulatory requirements	4	1	4	0
b. Required activities				
i. Initial performance test ^c	24	1	24	0
ii. Repeat performance test ^d	24	0.2	4.8	0
iii. Compile and process data ^e	4	4	16	0
iv. Add-on control performance test ^f	30	1	30	0
v. Repeat add-on control performance test ^f	30	1	30	0
c. 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 performance test/re-test ^{d,f}	2	1	2	0
vi. Report of performance test/re-test ^{d,f}	10	1	10	0
vii. Semiannual report ^g	6	2	12	0
viii. Excess emissions report ^h	2	2	4	0
ix. Startup, shutdown, malfunction report ⁱ	2	1	2	0
Subtotal for Reporting Requirements				
2. Recordkeeping requirements				
a. Familiarization with the regulatory requirements	4	1	4	0
b. Plan activities	12	1	12	0
c. Implement activities	12	1	12	0
d. Maintain record system for material used ^j	20	2	40	0
e. Time to enter information				
i. Material usage ^k	0.5	365	182.5	0
ii. Compliance calculation	2	12	24	0
f. Time to train personnel	10	1	10	0
g. Store, file, and maintain records ^l	2	12	24	0
h. Retrieve records/reports ^m	1	12	12	0
i. Revise record systems due to SSM revisions ⁿ	8	1	8	0
j. Become familiar with CEDRI for electronic filing of notifications and reports ^o	8	1	8	0

Subtotal for Recordkeeping Requirements				
Total Labor Burden and Cost (rounded) ^p				
Total Capital and O&M Cost (rounded) ^p				
Grand Total (rounded) ^p				

Assumptions:

- ^a We estimate that 43 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 ICR uses the following labor rates: \$147.40 per hour for Executive, Administrative, and Managerial labor; \$11.40 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.
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- ⁿ We assume that costs associated with elimination of the SSM exemption include time for re-evaluating previously determined exemptions.
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- ^p Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

<i>0</i>			<i>\$0</i>
0			\$0
			\$0
			\$0

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Table 3: Annual Respondent Burden and Cost – NESHAP for Automobile and Light-duty T Subpart III) (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. Applications	N/A			
2. Survey and Studies	N/A			
3. Reporting Requirements				
a. Familiarization with the regulatory requirements	4	1	4	0
b. Required activities				
i. Initial performance test ^c	24	1	24	0
ii. Repeat performance test ^d	24	0.2	4.8	0
iii. Compile and process data ^e	4	4	16	0
iv. Add-on control performance test ^f	30	1	30	5
v. Repeat add-on control performance test ^f	30	1	30	0
c. 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 performance test/re-test ^{d,f}	2	1	2	5
vi. Report of performance test/re-test ^{d,f}	10	1	10	5
vii. Semiannual report ^g	6	2	12	0
viii. Excess emissions report ^h	2	2	4	0
ix. Startup, shutdown, malfunction report ⁱ	2	1	2	0
Subtotal for Reporting Requirements				
2. Recordkeeping requirements				
a. Familiarization with the regulatory requirements	4	1	4	0
b. Plan activities	12	1	12	0
c. Implement activities	12	1	12	0
d. Maintain record system for material used ^j	20	2	40	0
e. Time to enter information				
i. Material usage ^k	0.5	365	182.5	0
ii. Compliance calculation	2	12	24	0
f. Time to train personnel	10	1	10	0
g. Store, file, and maintain records ^l	2	12	24	0
h. Retrieve records/reports ^m	1	12	12	0
i. Revise record systems due to SSM revisions ⁿ	8	1	8	0
j. Become familiar with CEDRI for electronic filing of notifications and reports ^o	8	1	8	0

Subtotal for Recordkeeping Requirements				
Total Labor Burden and Cost (rounded) ^p				
Total Capital and O&M Cost (rounded) ^p				
Grand Total (rounded) ^p				

Assumptions:

- ^a We estimate that 43 existing sources will be subject to the rule over the three-year period of this ICR, and no new sources will be added.
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- ^p Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

<i>0</i>			<i>\$0</i>
242			\$27,500
			\$95,000
			\$123,000

ources will become subject.

17.92 per hour for Technical labor, and \$57.02 per hour
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Table 4 - Summary of Annual Respondent Burden and Cost - NESHAP for Automobile a Coating (40 CFR Part 63, Subpart III) (Amendments)

Year	Technical Hours	Management Hours	Clerical Hours	Total Labor Hours	Labor Costs
1	860	43	86	989	\$113,000
2	0	0	0	0	\$0
3	210	11	21	242	\$27,500
Total	1,070	54	107	1,231	\$140,500
Average	357	18	35.7	410	\$47,000

Year	Number of Respondents	Number of Responses	Reporting Hours	Recordkeeping Hours	Total Hours
1	43	129	198	791	989
2	43	0	0	0	0
3	43	15	242	0	242
Total	-	144	439	791	1,231
Average	43	48	146	264	410

Average annual additional costs per respondent:

\$1,840

Average annual additional hours per respondent:

9.5

Average annual additional hours per response:

8.5

nd Light-duty Truck Surface

Non-Labor (Capital/Startup and O&M) Costs	Total Costs
\$0	\$113,000
\$0	\$0
\$95,000	\$122,500
\$95,000	\$235,500
\$32,000	\$79,000

Hours per Response	Hours Per Respondent
8.0	23
-	0
16	6
-	29
8.5	9.5

Table 5: Average Annual EPA Burden and Cost - NESHAP for Automobile and Light-duty CFR Part 63, Subpart IIII) (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 initial performance test ^d	24	0.2	4.8	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, e}	2	1	2	0	0
f. Report of performance test/re-test/ add-on control performance test/re-test ^{d, e}	8	1	8	0	0
g. Semiannual report ^f	12	2	24	0	0
h. Excess emissions report ^g	4	2	8	0	0
i. Startup, shutdown, malfunction report ^h	8	1	8	0	0
Total (rounded) ⁱ					

Assumptions:

^a We estimate that 43 existing sources will be subject to the rule over the three-year period of this ICR, and that no standard.

^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% 3, \$16.49 + 60%). These rates are from the Office of Personnel Management (OPM) “2018 General Schedule” w

^c We assume it will take 24 hours to complete the initial performance test review.

^d We assume 5 percent of respondents will need to repeat the performance test.

^e Assumes that the 5 facilities with add-on controls but without periodic testing requirements in their permits will assume a 5% failure and re-test rate (5 x 0.05 = 0.25). Since the fraction of re-tests (0.25) rounds down to zero, we

^f We assume it will take twelve hours to review semiannual reports.

^g We assume it will take four hours to review excess emissions reports. This will occur twice per year.

^h We assume 25 percent of respondents will use add-on controls, and that each report will take eight hours to review

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

ity Truck Surface Coating (40

(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	0.0	\$0
0		\$0

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

o new sources will become subject to the

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

do performance testing in year 3. We
assume no re-tests will be done.

ow.

Table 6: Average Annual EPA Burden and Cost - NESHAP for Automobile and Light-duty CFR Part 63, Subpart IIII) (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 initial performance test ^d	24	0.2	4.8	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, e}	2	1	2	0	0
f. Report of performance test/re-test/ add-on control performance test/re-test ^{d, e}	8	1	8	0	0
g. Semiannual report ^f	12	2	24	0	0
h. Excess emissions report ^g	4	2	8	0	0
i. Startup, shutdown, malfunction report ^h	8	1	8	0	0
Total (rounded) ⁱ					

Assumptions:

^a We estimate that 43 existing sources will be subject to the rule over the three-year period of this ICR, and that no standard.

^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% 3, \$16.49 + 60%). These rates are from the Office of Personnel Management (OPM) “2018 General Schedule” w

^c We assume it will take 24 hours to complete the initial performance test review.

^d We assume 5 percent of respondents will need to repeat the performance test.

^e Assumes that the 5 facilities with add-on controls but without periodic testing requirements in their permits will assume a 5% failure and re-test rate (5 x 0.05 = 0.25). Since the fraction of re-tests (0.25) rounds down to zero, we

^f We assume it will take twelve hours to review semiannual reports.

^g We assume it will take four hours to review excess emissions reports. This will occur twice per year.

^h We assume 25 percent of respondents will use add-on controls, and that each report will take eight hours to review

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

ity Truck Surface Coating (40

(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	\$0
0	0	\$0
0		\$0

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

o new sources will become subject to the

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

do performance testing in year 3. We
assume no re-tests will be done.

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Table 7: Average Annual EPA Burden and Cost - NESHAP for Automobile and Light-duty CFR Part 63, Subpart IIII) (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 initial performance test ^d	24	0.2	4.8	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, e}	2	1	2	5	10
f. Report of performance test/re-test/ add-on control performance test/re-test ^{d, e}	8	1	8	5	40
g. Semiannual report ^f	12	2	24	0	0
h. Excess emissions report ^g	4	2	8	0	0
i. Startup, shutdown, malfunction report ^h	8	1	8	0	0
Total (rounded) ^j					

Assumptions:

^a We estimate that 43 existing sources will be subject to the rule over the three-year period of this ICR, and that no standard.

^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% 3, \$16.49 + 60%). These rates are from the Office of Personnel Management (OPM) “2018 General Schedule” w

^c We assume it will take 24 hours to complete the initial performance test review.

^d We assume 5 percent of respondents will need to repeat the performance test.

^e Assumes that the 5 facilities with add-on controls but without periodic testing requirements in their permits will assume a 5% failure and re-test rate (5 x 0.05 = 0.25). Since the fraction of re-tests (0.25) rounds down to zero, we

^f We assume it will take twelve hours to review semiannual reports.

^g We assume it will take four hours to review excess emissions reports. This will occur twice per year.

^h We assume 25 percent of respondents will use add-on controls, and that each report will take eight hours to review

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

ity Truck Surface Coating (40

(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
0.5	1	\$546.74
2	4	\$2,186.94
0	0	\$0
0	0	\$0
0	0	\$0
58		\$2,730

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

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Table 8 - Summary of Annual Agency Burden and Cost - NESHAP for Automobile and Coating (40 CFR Part 63, Subpart IIII) (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	50	3	5	58	\$2,730
Total	50	2.5	5.0	58	\$2,700
Average	16.7	0.8	1.7	19	\$910

Year	Number of Responses	Total Hours
1	0	0
2	0	0
3	10	58
Total	10	58
Average	3.3	19

Average annual hours per response:

5.8

Light-duty Truck Surface

Non-Labor Costs	Total Costs
\$0	\$0
\$0	\$0
\$0	\$2,730
\$0	\$2,730
\$0	\$910

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	Total Capital/Startup Cost (B x C)	Annual O&M Costs for One Respondent
Performance Testing	\$19,000	5	\$95,000	\$0
Totals (rounded)			\$95,000	

Note: In year 3, five sources test one control device each at a cost of \$19,000. We assume a 5% failure rate for the test. If the failure rate 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)	
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	43	0	0
2	0	43	0	0
3	0	43	0	0
Average	0	43	0	0

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

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

Total \$95,000

est. Since the fraction of re-tests (0.25)

(E)
Number of Respondents (E=A+B+C-D)
43
43
43
43