

Table 1: Annual Respondent Burden and Cost - NESHAP for for Surface Coating of Met:

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. Familiarize with rule requirements	4	1	4	16
B. Process/review information	4	4	16	16
C. Plan Activities - Training ^c	10	1	10	16
D. Add-on Control Performance Test ^d	8	1	8	0
E. Write reports				
i. Initial notification	2	1	2	0
ii. Notification of initial compliance	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 ^d	2	1	2	0
vi. Report of performance test ^d	16	1	16	0
vii. Excess emissions report	4	0.5	2	16
viii. Semiannual report ^e	8	2	16	16
Subtotal for Reporting Requirements				
2. Recordkeeping requirements				
A. Familiarize with rule requirements	See 1.A			
B. Plan activities	See 1.C			
C. Implement activities	See 1.C			
D. Maintain record system for material used	20	1	20	16
E Time to enter information				
i. Material usage ^f	2	52	104	16
ii. Compliance calculation ^g	2	12	24	16
F. Time to train personnel	See 1.C			
G. Store, file, and maintain records	2	12	24	16
H Retrieve records/reports	1	12	12	16
Subtotal for Recordkeeping Requirements				
Total Labor Burden and Costs (rounded) ^h				
Total Capital and O&M Cost (rounded) ^h				
GRAND TOTAL ^h				

Assumptions:

^a We have assumed that there are approximately 16 respondents, with no additional new or reconstructed sources

^b This ICR uses the following labor rates: Managerial \$153.55 (\$73.12+ 110%); Technical \$122.20 (\$58.19 + 110 States Department of Labor, Bureau of Labor Statistics, March 2021, “Table 2. Civilian Workers, by occupational The rates have been increased by 110 percent to account for the benefit packages available to those employed by p

^c We assume each respondent will take ten hours, once per year to plan activities and train staff.

- ^d Facilities that comply using emission capture systems and add-on controls conduct air emissions performance testing (RRRR) using add-on controls to comply. We do not anticipate any facilities in this industry to have performance testing.
- ^e We have assumed that each respondent will take eight hours twice per year to complete the semiannual report. This is based on the assumption that each respondent will have a dedicated staff member to complete the report.
- ^f We have assumed that each respondent will take 1 hour twice per week to enter information.
- ^g We have assumed that each respondent will have to calculate compliance once per month. Compliance reports for each month are based on the previous month's data.
- ^h Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

al Furniture (40 CFR Part 63, Subpart RRRR) (Renewal)

(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) Annual costs (\$) ^b
64	3.2	6.4	\$8,705.82
256	12.8	25.6	\$34,823.30
160	8	16	\$21,764.56
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
32	1.6	3.2	\$4,353
256	12.8	25.6	\$34,823.30
883			\$104,470
320	16	32	\$43,529.12
1,664	83.2	166.4	\$226,351.42
384	19.2	38.4	\$52,234.94
384	19.2	38.4	\$52,234.94
192	9.6	19.2	\$26,117.47
3,386			\$400,468
4,270			\$505,000
			\$0
			\$505,000

Labor Rates	
Management	\$153.55
Technical	\$122.20
Clerical	\$61.51

107 hr/resp

becoming subject to the rule over the next three years.

); and Clerical \$61.51 (\$29.29 + 110%). These rates are from the United and industry group.” The rates are from column 1, “Total compensation.” private industry.

sting. There are no Surface Coating of Metal Furniture facilities (Subpart
esting costs.

he semiannual report includes all compliance reports for that period.

or the six-month period are filed with the semiannual report.

Table 2: Average Annual EPA Burden and Cost - NESHAP for for Surface Coating of M

Burden Item	(A)	(B)	(C)
	EPA Hours per Occurrence	Number of Occurrences Per Year	EPA Person Hours Per Year (A x B)
1. Initial performance test ^{c, d}	24	1	24
2. Repeat performance test ^d	24	0.2	4.8
3. Report review			
a) Initial notification	4	1	4
b) Notification of performance test ^e	4	1	4
c) Notification of initial compliance	8	1	8
d) Notification of construction/reconstruction	8	1	8
e) Notification of actual startup	8	1	8
g) Report of performance test ^f	8	1	8
h) Excess emissions report	8	0.5	4
i) Semiannual report and compliance reports ^g	12	2	24
Total (rounded) ^h			

Assumptions:

- ^a We have assumed that there are approximately 16 respondents, with no additional new or reconstructed source
- ^b This cost is based on the average hourly labor rate as follows: Managerial \$69.04 (GS-13, Step 5, \$43.15 + 60%)
- ^c The current ICR assumes it will take 24 hours to complete the task for each respondent.
- ^d Facilities that comply using emission capture systems and add-on controls conduct air emissions performance test
- ^e We assume it will take four hours to review the notification of the test and the test plan for each respondent.
- ^f We assume it will take eight hours to review the test report for each respondent.
- ^g We assume it will take twelve hours to review the semiannual reports for each respondent. The semiannual report
- ^h Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

Metallurgical Furniture (40 CFR Part 63, Subpart RRRR) (Renewal)

(D)	(E)	(F)	(G)	(H)
Plants Per Year ^a	Technical Hours Per Year (C x D)	Management Hours Per Year (E x 0.05)	Clerical Hours Per Year (E x 0.10)	Total 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	0	0	0	\$0
16	64	3.2	6.4	\$3,677
16	384	19.2	38.4	\$22,062.72
		515		\$25,700

Labor R
Management
Technical
Clerical

s becoming subject to the rule over the next three years.

); Technical \$51.23 (GS-12, Step 1, \$32.02 + 60%); and Clerical \$27.73 (GS-6, Step 3, \$17.33 +

esting. No sources use emission capture systems and add-on controls.

orts include the monthly compliance reports for that period.

ates
\$69.04
\$51.23
\$27.73

Number of Respondents					
	Respondents That Submit Reports		Respondents That Do Not Submit Any Reports		
Year	(A) Number of New Respondents ^a	(B) Number of Existing Respondents	(C) Number of Existing Respondents that keep records but do not submit reports	(D) Number of Existing Respondents That Are Also New Respondents	(E) Number of Respondents (E=A+B+C-D)
1	0	16	0	0	16
2	0	16	0	0	16
3	0	16	0	0	16
Average	0	16	0	0	16

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

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
Initial notification	0	1	0	0
Notification of initial compliance	0	1	0	0
Notification of construction/reconstruction	0	1	0	0
Notification of actual startup	0	1	0	0
Notification of performance test	0	1	0	0
Report of performance test	0	1	0	0
Excess emissions report	16	0.5	0	8
Semiannual report	16	2	0	32
			Total	40

Capital/Startup vs. Operation and Maintenance (O&M) Costs					
(A)	(B)	(C)	(D)	(E)	(F)

Continuous Monitoring Device	Capital/Startup Cost for One Respondent	Number of New Respondents	Total Capital/Startup Cost, (B X C)	Annual O&M Costs for One Respondent	Number of Respondents with O&M ^a
Testing for Add-on Control Device	\$19,000	0	\$0		
CEM				\$1,200	0
Total			\$0		

^a No respondents use add-on controls or monitoring devices to establish compliance with the emission standards.

(G)

Total O&M (E X F)
\$0
\$0