

TABLE 1: Annual Respondent Burden and Cost - NSPS for the Surface Coating of Plastic Parts (40 CFR part 60, subpart TTT)

REPORTING/RECORDKEEPING REQUIREMENT	(A) Respondent Hours per Occurrence (Technical hours)	(B) Number of Occurrences per Respondent per Year	(C) Hours per Respondent per Year (A x B)	(D) Number of Respondents per Year ^a
1. APPLICATIONS	N/A			
2. SURVEY AND STUDIES	N/A			
3. REPORTING REQUIREMENTS				
a. Familiarization with regulatory requirements ^c	0.87	1	0.87	10
b. Required Activities				
Initial Performance Tests ^d	2.61	1	2.61	0
Demonstration of CMS	N/A			
Repeat of Performance Tests ^e	2.61	0.2	0.52	0
Method 24 Testing ^{f,g}	78.26	4	313.04	0.01
c. Create Information	See 3b			
d. Gather Existing Information	See 3e			
e. Write Report				
Notification of Construction/Reconstruction ^h	1.74	1	1.74	0
Notification of Actual Startup ^h	1.74	1	1.74	0
Notification of Initial Performance Test ^h	1.74	1	1.74	0
Report of Performance Test	5.22	1	5.22	0
Quarterly Report of Noncompliance ⁱ	13.91	4	55.64	2
Semiannual Report of Compliance ⁱ	0.43	2	0.86	10
Subtotal for Reporting Requirements				
4. RECORDKEEPING REQUIREMENTS				
a. Read Instructions	See 3a			
b. Plan Activities	See 3b			
c. Implement Activities	See 3b			
d. Develop Record System	0.87	1	0.87	0
e. Time to Enter Information				
Record of monthly performance tests ^{a,k}	6.09	12	73.08	10
f. Train Personnel	N/A			
g. Audits	N/A			
Subtotal for Recordkeeping Requirements				
Total Labor Burden and Costs (rounded)^l				
Total Capital and O&M Costs (rounded)^l				
Grand Total (rounded)^l				

Assumptions

- ^a We have assumed that the average number of sources that will be subject to the standard will be 10. There will be no add rule over the three-year period of this ICR.
- ^b This ICR uses the following labor rates: \$153.33 (Managerial), \$122.20 (Technical), and \$61.51 (Clerical). These rates are from Labor Statistics, March 2021, "Table 2. Civilian Workers, by occupational and industry group", column 1, "Total compensation", which account for the benefit packages available to those employed by private industry.
- ^c We have assumed that it will take 1 hour for existing respondents to refamiliarize themselves with rule requirements.
- ^d We have assumed that it will take each respondent 2.61 hours once per year to complete the initial performance tests.
- ^e We have assumed that 20 percent of respondents will have to repeat performance tests due to failure.
- ^f We have assumed that it will take 78.26 hours to perform Method 24 testing. This testing is performed on the coatings manufacturers, who will then provide the test result to the respondents.
- ^g We have assumed that 0.1 percent of respondents must generate Method 24 test data for coating usage four times per year.
- ^h We have assumed that it will take 1.74 hours once per year to complete notification reports.
- ⁱ We have assumed that 20 percent of respondents (0.20*10=2 facilities) will exceed the emission standard at least once in a year. Two facilities will be required to write the quarterly excess emission report four times per year. We have assumed that it will take 6.09 hours to write the quarterly excess emission report.
- ^j We have assumed that each respondent will take 0.43 hours two times per year to write the semiannual report of compliance.
- ^k Hours required to record monthly performance tests are 6.09.
- ^l Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

for Business Machines

(E) Technical Hours per Year (C x D)	(F) Management Hours per Year (E x 0.05)	(G) Clerical Hours per Year (E x 0.1)	Total Labor Costs per Year ^b
8.70	0.44	0.87	\$1,183.45
0	0	0	\$0
0	0	0	\$0
3.13	0.16	0.31	\$425.82
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
111.28	5.56	11.13	\$15,137.25
8.60	0.43	0.86	\$1,169.85
151			\$17,916
0	0	0	\$0
730.80	36.54	73.08	\$99,409.63
840			\$99,410
992			\$117,000
			\$0
			\$117,000

Manager	\$153.55
Technical	\$122.20
Clerical	\$61.51
Hours per response	35
Number of Responses	28

itional new sources per year that will become subject to the

e from the United States Department of Labor, Bureau of
ation.” The rates have been increased by 110 percent to

ed by the respondents and is generally done by the coating

due to modification.

each quarterly reporting period; therefore, an average of
take 13.91 hours to write each quarterly report of

ice.

**TABLE 2: Annual Agency Burden and Cost - NSPS for the Surface Coating of Plastic Parts for Bu
(40 CFR part 60, subpart TTT)**

REPORTING/RECORDKEEPING REQUIREMENT	(A) EPA Hours per Occurrence (Technical hours)	(B) Number of Occurrences per Plant per Year	(C) EPA Hours per Year (A x B)	(D) Plants per Year ^a	(E) Technical Hours per Year (C x D)
Observe Initial Performance Tests ^c	2.61	1	2.61	0	0
Observe Repeat of Initial Performance Test ^d	2.61	0.2	0.52	0	0
Review Reports					
Notification of Construction ^e	1.74	1	1.74	0	0
Notification of Initial Startup ^e	1.74	1	1.74	0	0
Notification of Actual Startup ^e	1.74	1	1.74	0	0
Notification of Initial Test ^e	1.74	1	1.74	0	0
Review Test Results ^e	1.74	1	1.74	0.01	0.017
Quarterly Reports of Noncompliance ^f	6.96	4	27.83	2	55.65
Semiannual Reports of Compliance ^g	0.43	2	0.87	10	8.70
Total Annual Burden and Costs (rounded)^h					

Assumptions

^a We have assumed that the average number of sources that will be subject to the standard will be 10. There will be no additions subject to the rule over the three-year period of this ICR.

^b This ICR uses the following average hourly labor rates: \$69.04 Managerial (GS-13, Step 5%), \$51.23 Technical (GS-12, Step 5%). These rates are from the Office of Personnel Management (OPM), 2018 General Schedule, which excludes locality rates of pay adjustments to account for the benefit packages available to government employees.

^c We have assumed that it will take 2.61 hours once per year to complete initial performance test.

^d We have assumed that it will take 2.61 hours 0.2 times per year to repeat performance test.

^e We have assumed that it will take 1.74 hours once per year to review notification and review test results.

^f We have assumed that 20 percent of facilities will take 6.96 hours four times per year to report noncompliance.

^g We have assumed that each facility will take 0.43 hours two times per year to report semiannual compliance.

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

Business Machines

(F) Management Hours per Year (E x 0.05)	(G) Clerical Hours per Year (E x 0.1)	Costs per Year ^b
0	0	\$0
0	0	\$0
0	0	\$0
0	0	\$0
0	0	\$0
0	0	\$0
0.001	0.002	\$1
2.78	5.57	\$3,197.49
0.43	0.87	\$499.61
74		\$3,700

Manager \$69.04
 Technical \$51.23
 Clerical \$27.73

onal new sources per year that will become

p 1), and \$27.73 Clerical (GS-6, Step 3).
 y. The rates have been increased by 60