

ICR Summary Information

Hours per Response	144
Number of Respondents	57
Total Estimated Burden Hours	20,600
Total Estimated Costs	\$2,470,000
Annualized Capital O&M	\$4,800
Total Annual Responses	143
Form Number	5900-594

Table 1: Annual Respondent Burden and Cost – NESHAP for the Wood Building Products

123.94

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	(E) Technical person-hrs. per year (E=CxD)
1. Reporting requirements					
a. Familiarize with rule requirements	4	1	4	57	228
b. Process/review information	4	4	16	57	912
c. Prepare for initial test performance test	24	1	24	0	0
d. Write reports					
i. Initial notification	2	1	2	0	0
ii. Notification of compliance status ^d	10	1	10	0	0
iii. Notification of construction/reconstruction	2	1	2	0	0
iv. Notification of actual startup	2	1	2	0	0
v. Notification of performance test	2	1	2	0	0
vi. Report of performance test (through ERT) ^e	10	1	10	0	0
vii. Semiannual report	8	2	16	57	912
viii. Excess emissions report	4	0.5	2	57	114
<i>Subtotal for Reporting Requirements</i>					
2. Recordkeeping requirements					
a. Familiarize with rule requirements	See 1A				
b. Plan activities	12	1	12	57	684
c. Implement activities	12	1	12	57	684
d. Maintain record system for material used	20	1	20	57	1,140
e. Time to enter information					
i. Material purchase records ^c	4	1	4	23	92
ii. Material usage records ^c	16	12	192	34	6,528
iii. Compliance calculations ^c	8	12	96	34	3,264
f. Time to train personnel ^f	10	1	10	57	570
g. Store, file, and maintain records	4	12	48	57	2,736
h. Retrieve records/reports	2	12	24	57	57
<i>Subtotal for Recordkeeping Requirements</i>					
TOTAL LABOR BURDEN AND COST (rounded)^g					
Capital and O&M Cost^g					
Grand TOTAL^g					

Assumptions:

^a There is an average of 57 respondents per year over the next three years of this ICR. In addition, we have assumed regulation.

^b This ICR uses the following labor rates: \$157.61 per hour for Executive, Administrative, and Managerial labor; \$100.00 per hour for Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics Occupational and Industry group.” The rates are from “column 1, Total Compensation”. The rates have been increased to include industry wage rates and the additional overhead business costs of employing workers beyond their wages and benefits, hiring, training, and equipping their employees.

^c We estimate that 40% of facilities are using the compliant material option to comply with the rule; therefore 40% of the 57 facilities (23 respondents) provide material purchase records and 60% of the 57 facilities (34 respondents) are tracking material usage and disposal.

^d We estimate that it will take the respondent 10 hours to prepare the notification of compliance status.

^e We estimate that it will take the respondent 10 hours to prepare and submit an initial performance test report.

^f We estimate that it will take the respondent 10 hours once per year for initial training of personnel.

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

cts Surface Coating Industry (40 CFR Part 63, Subpart QQQQ) (Renewal)

157.61 62.52

(F) Management person-hrs. per year (F=Ex0.05)	(G) Clerical person-hrs. per year (G=Ex0.1)	(H) Annual costs (\$) ^b
11.4	22.8	\$31,480.53
45.6	91.2	\$125,922.12
0	0	\$0
0	0	\$0
0	0	\$0
0	0	\$0.00
0	0	\$0.00
0	0	\$0.00
0	0	\$0.00
45.6	91.2	\$125,922.12
5.7	11.4	\$15,740.27
2,491		\$299,065
34.2	68.4	\$94,441.59
34.2	68.4	\$94,441.59
57	114	\$157,402.65
4.6	9.2	\$12,702.67
326.4	652.8	\$901,337.28
163.2	326.4	\$450,668.64
28.5	57	\$78,701.33
136.8	273.6	\$377,766.36
2.85	5.7	\$7,870.13
18,118		\$2,175,332
20,600		\$2,470,000
		\$4,800
		\$2,470,000

144 hr/resp

ned that no new facilities will become subject to this

; \$123.94 per hour for Technical labor, and \$62.52
cs, September 2021, “Table 2. Civilian Workers, by
reased by 110 percent to account for varying
enefits, including business expenses associated with

% of the 57 facilities (23 respondents) have to
oing monthly compliance calculations.

Table 2: Average Annual EPA Burden and Cost – NESHAP for the Wood Building Product

Burden Item	(A) EPA Person-hours per activity	(B) No. of occurrences per plant per year	(C) EPA person-hours per plant per year (C=AxB)
1. Initial performance test	24	0	0
2. Repeat performance test	24	0	0
3. Report review			
a) Initial notification	8	0	0
b) Notification of performance test	8	0	0
c) Notification of compliance status	8	0	0
d) Notification of construction/reconstruction	8	0	0
e) Notification of actual startup	8	0	0
f) Notification of performance test	8	0	0
g) Report of performance test	8	0	0
h) Semiannual report	12	2	24
i) Excess emissions report	8	0.5	4
Total Burden Hours and Costs ^c			

Assumptions:

^a There is an average of 57 respondents per year over the next three years of this ICR. In addition, we have assumed

^b This cost is based on the following labor rates: Managerial rate of \$70.56 (GS-13, Step 5, \$44.10 + 60%), Technician rate of \$44.10 (GS-11, Step 5, \$26.31 + 60%). These rates are from the Office of Personnel Management (OPM), 2022 General Schedule, which excludes packages available to government employees.

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

Coatings Surface Coating Industry (40 CFR Part 63, Subpart QQQQ) (Renewal)

52.37 70.56 28.34

(D) Plants per year ^a	(E) Technical person- hours per year (E=CxD)	(F) Management person-hours per year (D=Cx0.05)	(G) Clerical person- hours per year (E=Cx0.1)	(H) Annual costs (\$) ^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
0	0	0	0	\$0
0	0	0	0	\$0
57	1,368	68.4	136.8	\$80,345
57	228	11.4	22.8	\$13,391
	1,840			\$94,000

ed that no new facilities will become subject to this regulation.

nical rate of \$52.37 (GS-12, Step 1, \$32.73 + 60%), and Clerical rate of \$28.34 (GS-6, Step 3, \$17.17 es locality rates of pay. The rates have been increased by 60 percent to account for the benefit

Capital/Startup vs. Operation and Maintenance			
(A)	(B)	(C)	(D)
Continuous Monitoring Device	Capital/Startup Cost for One Respondent	Number of New Respondents ^a	Total Capital/Startup Cost, (B X C)
CPMS	\$16,000	0	\$0
Method 24/25A performance test	\$14,000	0	\$0
Method 326/NCASI Method ISS/FP A105.01/Method 320 performance test	\$14,000	0	\$0
Method 204 performance test	\$8,000	0	\$0
Totals (rounded) ^c			\$0

^a We estimate no new respondents will become subject to the standard in the next three years.

^b We estimate 4 of the 57 respondents use add-on controls with a CPMS during the three-year period of this I

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

(O&M) Costs

(E)	(F)	(G)
Annual O&M Costs for One Respondent	Number of Respondents with O&M^b	Total O&M, (E X F)
\$1,200	4	\$4,800
\$0	0	\$0
\$0	0	\$0
\$0	0	\$0
		\$4,800

Total Capital/Start

CR.

up vs. Operation and Maintenance (O&M) Costs

\$4,800

Total Annual Responses				
(A)	(B)	(C)	(D)	(E)
Information Collection Activity	Number of Respondents ^a	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 compliance status	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	1.2	0	0
Report of performance test	0	1.2	0	0
Semiannual report	57	2	0	114
Excess emissions report	57	0.5	0	28.5
			Total	143

^a There is an average of 57 respondents per year over the next three years of this ICR. In addition, we have assumed that no new facility will become subject to this regulation.

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	0	57	0	0
2	0	57	0	0
3	0	57	0	0
Average	0	57	0	0

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

(E)
Number of Respondents (E=A+B+C-D)
57
57
57
57