

ICR Summary Information

Hours per Response	1
Number of Respondents	219
Total Estimated Burden Hours	504
Total Estimated Costs	\$134,000
Annualized Capital O&M	\$0
Total Annual Responses	438
Form Number	Not Applicable

Table 1: Annual Respondent Burden and Cost – NESHAP for Paints and Allied Products Manuf:

Burden Item	(A) Person hours per occurrence	(B) No. of occurrences per respondent per year	(C) Person hours per respondent per year (C=AxB)	(D) Respondents per year ^a
1. Applications	N/A			
2. Survey and studies	N/A			
3. Acquisition, installation, and utilization of technical systems	N/A			
4. Reporting requirements				
A. Familiarization with the regulatory requirement	2	1	2	22
B. Required activities				
Initial notification ^c	1	1	1	0
Notification of compliance status ^c	1	1	1	0
Annual compliance certification ^d	1	1	1	22
Report of exceedences ^d	2	1	2	22
C. Create information	See 4B			
D. Gather existing information	See 4B			
E. Write report	See 4B			
Reporting subtotal				
5. Recordkeeping requirements				
A. Familiarization with the regulatory requirement	See 4A			
B. Plan activities	See 5E			
C. Implement activities	See 5E			
D. Develop record system	See 5E			
E. Time to enter information				
Records of all information required by standards	0.25	1	0.25	219
F. Time and cost to perform VE observation ^e	1	1	1	219
G. Time to adjust existing ways to comply with previous applicable regulations	N/A			
H. Time to transmit or disclose information	0.25	1	0.25	219
I. Time for audits	N/A			
Recordkeeping subtotal				
TOTAL ANNUAL BURDEN AND COSTS (rounded): ^f				
Capital and O&M Cost (see Section 6(b)(iii)):				
TOTAL COST: ^f				

Assumptions:

^a We have assumed that there are 219 existing facilities that are subject to the rule, and that no new major sources per year percent of facilities will be required to respond and will refamiliarize with the rule requirements each year.

- ^b This ICR uses the following labor rates: \$157.61 per hour for Executive, Administrative, and Managerial labor; \$123.94 per hour for Professional labor; and \$100.00 per hour for all other labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, September 2021, “Table 2: Civilian Workers, by Occupation, Sex, Race, and Hispanic or Latino Ethnicity, Compensation.” The rates have been increased by 110 percent to account for varying industry wage rates and the additional costs of hiring, training, and equipping their employees.
- ^c This burden item applies to new facilities only. No new facilities are expected over the three-year period of this ICR.
- ^d This report does not need to be submitted unless a deviation from the requirements of this subpart has occurred. We estimate the burden of this reporting requirement to be 1 hour per facility per year.
- ^e Cost includes \$335 per facility to certify technical person in VE (EPA Method 9) testing.
- ^f Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

acturing Area Source Category (40 CFR Part 63, Subpart CCCCCC) (Renewal)

(E) Technical person- hours per year (E=CxD)	(F) Management person hours per year (Ex0.05)	(G) Clerical person hours per year (Ex0.1)	(H) Cost, \$ ^b
44	2.2	4.4	\$6,075.19
0	0	0	\$0
0	0	0	\$0
22	1.10	2.2	\$3,037.60
44	2.2	4.4	\$6,075.19
127			\$15,187.98
54.8	2.74	5.48	\$7,559.47
219	11.0	22	\$103,602.88
54.8	2.74	5.48	\$7,559.47
378			\$118,721.82
504			\$134,000
			\$0
			\$134,000

TECH \$123.94
MNG \$157.61
CLER \$62.52

504

1 hrs/response

will become subject over the 3 year-period of this ICR. We assume that 10

per hour for Technical labor, and \$62.52 per hour for Clerical labor. These rates
by Occupational and Industry group.” The rates are from column 1, “Total
l overhead business costs of employing workers beyond their wages and benefits,

rate that 10 percent of facilities will experience deviations.

Table 2: Average Annual EPA Burden and Cost – NESHAP for Paints and Allied Products

Burden Item	(A) Person hours per occurrence	(B) No. of occurrences per respondent per year	(C) Person hours per respondent per year (C=AxB)	(D) Respondents per year ^a
Report review				
Initial notification ^c	1	1	1	0
Notification of compliance status ^c	2	1	2	0
Annual compliance certification ^d	2	1	2	22
Report of exceedance ^d	2	1	2	22
TOTAL ANNUAL BURDEN ^e				

Assumptions:

^a We have assumed that there are 219 existing facilities that are subject to the rule, and that no new major sources are expected. We assume that 10 percent of facilities will be required to respond.

^b This ICR uses the following labor rates: \$70.56 per hour for Managerial labor; \$52.37 per hour for Technical labor. The rates are based on the Office of Personnel Management (OPM), 2022 General Schedule, which excludes locality rates of pay. The rates are only available to government employees.

^c This burden item applies to new facilities only. No new facilities are expected over the three-year period of this ICR.

^d This report does not need to be submitted unless a deviation from the requirements of this subpart has occurred. We assume that 10 percent of facilities will be required to respond.

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

Manufacturing Area Source Category (40 CFR Part 63, Subpart CCCCCC) (Renewal)

TECH 52.37
MNG 70.56

CLER 28.34

(E) Technical person- hours per year (E=CxD)	(F) Management person hours per year (Ex0.05)	(G) Clerical person hours per year (Ex0.1)	(H) Cost, \$ ^b
0	0	0	\$0
0	0	0	\$0
44	2.2	4.4	\$2,584.21
44	2.2	4.4	\$2,584.21
101			\$5,170

er year will become subject over the 3 year-period of this ICR. We

; and \$28.34 per hour for Clerical labor. These rates are from the
ve been increased by 60% to account for the benefit packages

CR.

ve estimate that 10 percent of facilities will experience deviations.

Number of Respondents				
	Respondents That Submit Reports		Respondents That Do Not Submit Any Reports	
	(A)	(B)	(C)	(D)
Year	Number of New Respondents¹	Number of Existing Respondents²	Number of Existing Respondents that keep records but do not submit reports	Number of Existing Respondents That Are Also New Respondents
1	0	22	197	0
2	0	22	197	0
3	0	22	197	0
Average	0	22	197	0

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

² Existing respondents include sources required to submit a report of deviation; this applies to only 10% of sources.

(E)
Number of Respondents (E=A+B+C-D)
219
219
219
219

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 $E=(B \times C)+D$
Annual Compliance Certification Report	22	1	197	219
Report of Exceedances	22	1	197	219
			Total	438