

**Table 1: Annual Respondent Burden and Cost - NESHAP for Miscellaneous Coating Manufactur HHHHH) (Amendments)**

**Year 1**

Burden item	(A) Person hours per occurrence	(B) No. of occurrences per respondent per year	(C) Person hours per respondent per year (AxB)	(D) Respondent s per year <sup>a</sup>	(E) Technical person- hours per year (Cx D)
1. Applications	N/A				
2. Survey and Studies	N/A				
3. Reporting Requirements					
A. Familiarization with the regulatory requirements	4	1	4	43	172
B. Required Activities					
Add-on control performance test <sup>c</sup>	30	1	30	0	0
Repeat add-on control performance test <sup>c</sup>	30	1	30	0	0
Initial CMS performance evaluation <sup>d</sup>	10	1	10	0	0
Create Information	See 4				
Gather Existing Information	See 4				
C. Write Reports					
Notification of construction/reconstruction	2	1	2	0	0
Notification of anticipated startup	2	1	2	0	0
Notification of actual startup	2	1	2	0	0
Notification of applicability of standard					
i. Existing sources	2	0	0	0	0
ii. New sources	2	1	2	0	0
Emissions averaging plan <sup>e</sup>	40	1	40	0	0
Pre-compliance report <sup>f</sup>	40	1	40	0	0
Notification of performance test/re-test <sup>g</sup>	2	1	2	0	0
Performance test/re-test report <sup>g</sup>	10	1	10	0	0
Notification of initial CMS performance evaluation <sup>d</sup>	2	1	1	0	0
Notification of compliance status <sup>g</sup>					
i. With performance test	80	1	80	0	0
ii. Without performance test	120	1	120	0	0
Notification of process change <sup>h</sup>	8	1	8	0	0
Semi-annual compliance report - no deviations <sup>i</sup>	4	2	8	0	0
Semi-annual compliance report - with deviations <sup>i</sup>	12	2	24	0	0
Startup, shutdown, and malfunction report <sup>j</sup>	8	1	8	0	0
LDAR report <sup>k</sup>	125	2	250	0	0
Emissions averaging report <sup>l</sup>	20	1	20	0	0
<b>Subtotal for Reporting Requirements</b>					
4. Recordkeeping requirements					
A. Familiarization with the regulatory requirements	See 3A				
B. Plan activities	N/A				
C. Implement Activities	N/A				
D. Develop record system <sup>m</sup>	40	1	40	0	0

E. Develop startup, shutdown, malfunction plan <sup>n</sup>	100	1	100	0	0
F. Develop QA/QC Plan for CMS <sup>o</sup>	40	1	40	0	0
G. Time to enter information					
i. Records of startup, shutdown, and malfunction	1.5	1	1.5	0	0
ii. Records of CMS data					
a. Record continuously monitored parameters	1	365	365	0	0
b. Compile data	24	2	48	0	0
c. Information for semi-annual reports	16	2	32	0	0
d. LDAR recordkeeping	See 3C				
iii. Records of operating hours and add-on control bypass hours per semiannual compliance period	0.5	2	1	23	23
H. Calibration of CMS	376	1	376	0	0
I. Time to train personnel <sup>p</sup>	40	1	40	0	0
J. Refresher course <sup>q</sup>	16	1	16	0	0
K. Time for audits	N/A				0
L. Revise record systems due to SSM revisions <sup>r</sup>	8	1	8	43	344
M. Become familiar with CEDRI for electronic filing of notifications and reports <sup>s</sup>	8	1	8	43	344
<b>Subtotal for Recordkeeping Requirements</b>					
<b>Total Labor Burden and Costs (rounded) <sup>t</sup></b>					
<b>Total Capital and O&amp;M Cost (rounded) <sup>t</sup></b>					
<b>Grand Total (rounded) <sup>t</sup></b>					

**Assumptions:**

- <sup>a</sup> There are 43 existing major source facilities subject to the NESHAP. We assume no new sources will become subject during the three-
- <sup>b</sup> This ICR uses the following labor rates: \$147.40 per hour for Executive, Administrative, and Managerial labor; \$117.92 per hour for T labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, June 2018, "Table 2: Civilian Workers, by are from column 1, "Total Compensation." The rates have been increased by 110 percent to account for the benefit packages available to
- <sup>c</sup> 23 facilities have add-on controls for compliance. The performance test will affect 12 facilities in the third year. These facilities do not ; permits.
- <sup>d</sup> Assumes 10 hours to conduct a CMS performance evaluation and 2 hours to prepare a notification.
- <sup>e</sup> Assumes that all existing facilities have complied with the emissions averaging requirements; new facilities are not allowed to use emis
- <sup>f</sup> Assumes 50 percent of the new facilities will submit a pre-compliance report.
- <sup>g</sup> Assumes that the 12 facilities without periodic testing requirements in their permits will do performance testing in year 3. Assume a 5% Assumes all other facilities will comply by submitting engineering calculations and design calculations.
- <sup>h</sup> Assumes 10 percent of the facilities will implement process changes.
- <sup>i</sup> Assumes 10 percent will have deviations.
- <sup>j</sup> Assumes 5% of all facilities will report actions taken during a startup, shutdown, or malfunction is not consistent with the plan.
- <sup>k</sup> Assumes all facilities will be subject to the equipment leak standards with an average of 125 hours per report.
- <sup>l</sup> Assumes that 10 percent of existing facilities will use with the emissions averaging reports to comply.
- <sup>m</sup> Assumes 40 hours to develop a record system for recording parameter monitoring information.
- <sup>n</sup> Assumes 80 hours to draft the startup, shutdown, and malfunction plan and another 20 hours of review/revisions, for a total of 100 hour
- <sup>o</sup> Assumes 40 hours to develop/review the QA/QC plan for the CMS. No QA/QC plan is required for the parameter monitoring systems :

<sup>p</sup> Assumes no facilities will use the alternative standard, which requires CEMS and QA/QC plans.

<sup>q</sup> Assumes 40 hours to train personnel and 16 hours for an annual refresher course.

<sup>r</sup> We assume that costs associated with elimination of the SSM exemption include time for re-evaluating previously developed plans. Costs also associated with the use of electronic reporting and include time to become familiar with CEDRI and the semi-annual reporting requirements.

<sup>s</sup> Responses in year one associated with the use of electronic reporting include becoming familiar with CEDRI and the semi-annual reporting requirements.

<sup>t</sup> Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.



0	0	\$0
0	0	\$0
0	0	\$0
0	0	\$0
0	0	\$0
0	0	\$0
1.15	2.3	\$3,013
0	0.0	\$0
0	0	\$0
0	0	\$0
0	0	\$0
17.2	34.4	\$45,061.25
17.2	34.4	\$45,061.25
<b>818</b>		<b>\$93,135</b>
<b>1,000</b>		<b>\$116,000</b>
		<b>\$0</b>
		<b>\$116,000</b>

year period of this ICR.

technical labor, and \$57.02 per hour for Clerical  
 y Occupational and Industry Group.” The rates  
 those employed by private industry.

already have a testing requirement in their

sions averaging.

failure and re-test rate ( $12 \times 0.05 = 0.6$ ).

s.

included in the rule.

ed SSM record systems in year one. Costs  
il reporting form.

i-annual reporting form.

**Table 2: Annual Respondent Burden and Cost - NESHAP for Miscellaneous Coating Manufactur HHHHH) (Amendments)**

**Year 2**

Burden item	(A) Person hours per occurrence	(B) No. of occurrences per respondent per year	(C) Person hours per respondent per year (AxB)	(D) Respondent s per year <sup>a</sup>	(E) Technical person- hours per year (Cx D)
1. Applications	N/A				
2. Survey and Studies	N/A				
3. Reporting Requirements					
A. Familiarization with the regulatory requirements	4	1	4	0	0
B. Required Activities					
Add-on control performance test <sup>c</sup>	30	1	30	0	0
Repeat add-on control performance test <sup>c</sup>	30	1	30	0	0
Initial CMS performance evaluation <sup>d</sup>	10	1	10	0	0
Create Information	See 4				
Gather Existing Information	See 4				
C. Write Reports					
Notification of construction/reconstruction	2	1	2	0	0
Notification of anticipated startup	2	1	2	0	0
Notification of actual startup	2	1	2	0	0
Notification of applicability of standard					
i. Existing sources	2	0	0	0	0
ii. New sources	2	1	2	0	0
Emissions averaging plan <sup>e</sup>	40	1	40	0	0
Pre-compliance report <sup>f</sup>	40	1	40	0	0
Notification of performance test/re-test <sup>g</sup>	2	1	2	0	0
Performance test/re-test report <sup>g</sup>	10	1	10	0	0
Notification of initial CMS performance evaluation <sup>d</sup>	2	1	1	0	0
Notification of compliance status <sup>g</sup>					
i. With performance test	80	1	80	0	0
ii. Without performance test	120	1	120	0	0
Notification of process change <sup>h</sup>	8	1	8	0	0
Semi-annual compliance report - no deviations <sup>i</sup>	4	2	8	0	0
Semi-annual compliance report - with deviations <sup>i</sup>	12	2	24	0	0
Startup, shutdown, and malfunction report <sup>j</sup>	8	1	8	0	0
LDAR report <sup>k</sup>	125	2	250	0	0
Emissions averaging report <sup>l</sup>	20	1	20	0	0
<b>Subtotal for Reporting Requirements</b>					
4. Recordkeeping requirements					
A. Familiarization with the regulatory requirements	See 3A				
B. Plan activities	N/A				
C. Implement Activities	N/A				
D. Develop record system <sup>m</sup>	40	1	40	0	0

E. Develop startup, shutdown, malfunction plan <sup>n</sup>	100	1	100	0	0
F. Develop QA/QC Plan for CMS <sup>o</sup>	40	1	40	0	0
G. Time to enter information					
i. Records of startup, shutdown, and malfunction	1.5	1	1.5	0	0
ii. Records of CMS data					
a. Record continuously monitored parameters	1	365	365	0	0
b. Compile data	24	2	48	0	0
c. Information for semi-annual reports	16	2	32	0	0
d. LDAR recordkeeping	See 3C				
iii. Records of operating hours and bypass hours per semiannual compliance period	0.5	2	1	23	23
H. Calibration of CMS	376	1	376	0	0
I. Time to train personnel <sup>p</sup>	40	1	40	0	0
J. Refresher course <sup>q</sup>	16	1	16	0	0
K. Time for audits	N/A				0
L. Revise record systems due to SSM revisions <sup>r</sup>	8	1	8	0	0
M. Become familiar with CEDRI for electronic filing of notifications and reports <sup>s</sup>	8	1	8	0	0
<b>Subtotal for Recordkeeping Requirements</b>					
<b>Total Labor Burden and Costs (rounded) <sup>t</sup></b>					
<b>Total Capital and O&amp;M Cost (rounded) <sup>t</sup></b>					
<b>Grand Total (rounded) <sup>t</sup></b>					

**Assumptions:**

<sup>a</sup> There are 43 existing major source facilities subject to the NESHAP. We assume no new sources will become subject during the three-

<sup>b</sup> This ICR uses the following labor rates: \$147.40 per hour for Executive, Administrative, and Managerial labor; \$117.92 per hour for T labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, June 2018, "Table 2: Civilian Workers, by are from column 1, "Total Compensation." The rates have been increased by 110 percent to account for the benefit packages available to

<sup>c</sup> 23 facilities have add-on controls for compliance. The performance test will affect 12 facilities in the third year. These facilities do not have permits.

<sup>d</sup> Assumes 10 hours to conduct a CMS performance evaluation and 2 hours to prepare a notification.

<sup>e</sup> Assumes that all existing facilities have complied with the emissions averaging requirements; new facilities are not allowed to use emissions averaging.

<sup>f</sup> Assumes 50 percent of the new facilities will submit a pre-compliance report.

<sup>g</sup> Assumes that the 12 facilities without periodic testing requirements in their permits will do performance testing in year 3. Assume a 5% deviation rate. Assumes all other facilities will comply by submitting engineering calculations and design calculations.

<sup>h</sup> Assumes 10 percent of the facilities will implement process changes.

<sup>i</sup> Assumes 10 percent will have deviations.

<sup>j</sup> Assumes 5% of all facilities will report actions taken during a startup, shutdown, or malfunction is not consistent with the plan.

<sup>k</sup> Assumes all facilities will be subject to the equipment leak standards with an average of 125 hours per report.

<sup>l</sup> Assumes that 10 percent of existing facilities will use with the emissions averaging reports to comply.

<sup>m</sup> Assumes 40 hours to develop a record system for recording parameter monitoring information.

<sup>n</sup> Assumes 80 hours to draft the startup, shutdown, and malfunction plan and another 20 hours of review/revisions, for a total of 100 hours.

<sup>o</sup> Assumes 40 hours to develop/review the QA/QC plan for the CMS. No QA/QC plan is required for the parameter monitoring systems.

<sup>p</sup> Assumes no facilities will use the alternative standard, which requires CEMS and QA/QC plans.

<sup>q</sup> Assumes 40 hours to train personnel and 16 hours for an annual refresher course.

<sup>r</sup> We assume that costs associated with elimination of the SSM exemption include time for re-evaluating previously developed plans. Costs also associated with the use of electronic reporting and include time to become familiar with CEDRI and the semi-annual reporting requirements.

<sup>s</sup> Responses in year one associated with the use of electronic reporting include becoming familiar with CEDRI and the semi-annual reporting requirements.

<sup>t</sup> Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.



0	0	\$0
0	0	\$0
0	0	\$0
0	0	\$0
0	0	\$0
0	0	\$0
1.15	2.3	\$3,013
0	0.0	\$0
0	0	\$0
0	0	\$0
0	0	\$0
0	0	\$0
0	0	\$0
0	0	\$0
<b>26</b>		<b>\$3,013</b>
<b>0</b>		<b>\$3,000</b>
		<b>\$0</b>
		<b>\$3,000</b>

year period of this ICR.

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**Table 3: Annual Respondent Burden and Cost - NESHAP for Miscellaneous Coating Manufactur HHHHH) (Amendments)**

**Year 3**

Burden item	(A) Person hours per occurrence	(B) No. of occurrences per respondent per year	(C) Person hours per respondent per year (AxB)	(D) Respondent s per year <sup>a</sup>	(E) Technical person- hours per year (Cx D)
1. Applications	N/A				
2. Survey and Studies	N/A				
3. Reporting Requirements					
A. Familiarization with the regulatory requirements	4	1	4	0	0
B. Required Activities					
Add-on control performance test <sup>c</sup>	30	1	30	12	360
Repeat add-on control performance test <sup>c</sup>	30	1	30	1	30
Initial CMS performance evaluation <sup>d</sup>	10	1	10	0	0
Create Information	See 4				
Gather Existing Information	See 4				
C. Write Reports					
Notification of construction/reconstruction	2	1	2	0	0
Notification of anticipated startup	2	1	2	0	0
Notification of actual startup	2	1	2	0	0
Notification of applicability of standard					
i. Existing sources	2	0	0	0	0
ii. New sources	2	1	2	0	0
Emissions averaging plan <sup>e</sup>	40	1	40	0	0
Pre-compliance report <sup>f</sup>	40	1	40	0	0
Notification of performance test/re-test <sup>g</sup>	2	1	2	13	26
Performance test/re-test report <sup>g</sup>	10	1	10	13	130
Notification of initial CMS performance evaluation <sup>d</sup>	2	1	1	0	0
Notification of compliance status <sup>g</sup>					
i. With performance test	80	1	80	0	0
ii. Without performance test	120	1	120	0	0
Notification of process change <sup>h</sup>	8	1	8	0	0
Semi-annual compliance report - no deviations <sup>i</sup>	4	2	8	0	0
Semi-annual compliance report - with deviations <sup>i</sup>	12	2	24	0	0
Startup, shutdown, and malfunction report <sup>j</sup>	8	1	8	0	0
LDAR report <sup>k</sup>	125	2	250	0	0
Emissions averaging report <sup>l</sup>	20	1	20	0	0
<b>Subtotal for Reporting Requirements</b>					
4. Recordkeeping requirements					
A. Familiarization with the regulatory requirements	See 3A				
B. Plan activities	N/A				
C. Implement Activities	N/A				
D. Develop record system <sup>m</sup>	40	1	40	0	0

E. Develop startup, shutdown, malfunction plan <sup>n</sup>	100	1	100	0	0
F. Develop QA/QC Plan for CMS <sup>o</sup>	40	1	40	0	0
G. Time to enter information					
i. Records of startup, shutdown, and malfunction	1.5	1	1.5	0	0
ii. Records of CMS data					
a. Record continuously monitored parameters	1	365	365	0	0
b. Compile data	24	2	48	0	0
c. Information for semi-annual reports	16	2	32	0	0
d. LDAR recordkeeping	See 3C				
iii. Records of operating hours and bypass hours per semiannual compliance period	0.5	2	1	23	23
H. Calibration of CMS	376	1	376	0	0
I. Time to train personnel <sup>p</sup>	40	1	40	0	0
J. Refresher course <sup>q</sup>	16	1	16	0	0
K. Time for audits	N/A				0
L. Revise record systems due to SSM revisions <sup>r</sup>	8	1	8	0	0
M. Become familiar with CEDRI for electronic filing of notifications and reports <sup>s</sup>	8	1	8	0	0
<b>Subtotal for Recordkeeping Requirements</b>					
<b>Total Labor Burden and Costs (rounded) <sup>t</sup></b>					
<b>Total Capital and O&amp;M Cost (rounded) <sup>t</sup></b>					
<b>Grand Total (rounded) <sup>t</sup></b>					

**Assumptions:**

<sup>a</sup> There are 43 existing major source facilities subject to the NESHAP. We assume no new sources will become subject during the three-

<sup>b</sup> This ICR uses the following labor rates: \$147.40 per hour for Executive, Administrative, and Managerial labor; \$117.92 per hour for T labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, June 2018, "Table 2: Civilian Workers, by" are from column 1, "Total Compensation." The rates have been increased by 110 percent to account for the benefit packages available to

<sup>c</sup> 23 facilities have add-on controls for compliance. The performance test will affect 12 facilities in the third year. These facilities do not have permits.

<sup>d</sup> Assumes 10 hours to conduct a CMS performance evaluation and 2 hours to prepare a notification.

<sup>e</sup> Assumes that all existing facilities have complied with the emissions averaging requirements; new facilities are not allowed to use emis

<sup>f</sup> Assumes 50 percent of the new facilities will submit a pre-compliance report.

<sup>g</sup> Assumes that the 12 facilities without periodic testing requirements in their permits will do performance testing in year 3. Assume a 5% Assumes all other facilities will comply by submitting engineering calculations and design calculations.

<sup>h</sup> Assumes 10 percent of the facilities will implement process changes.

<sup>i</sup> Assumes 10 percent will have deviations.

<sup>j</sup> Assumes 5% of all facilities will report actions taken during a startup, shutdown, or malfunction is not consistent with the plan.

<sup>k</sup> Assumes all facilities will be subject to the equipment leak standards with an average of 125 hours per report.

<sup>l</sup> Assumes that 10 percent of existing facilities will use with the emissions averaging reports to comply.

<sup>m</sup> Assumes 40 hours to develop a record system for recording parameter monitoring information.

<sup>n</sup> Assumes 80 hours to draft the startup, shutdown, and malfunction plan and another 20 hours of review/revisions, for a total of 100 hour

<sup>o</sup> Assumes 40 hours to develop/review the QA/QC plan for the CMS. No QA/QC plan is required for the parameter monitoring systems

<sup>p</sup> Assumes no facilities will use the alternative standard, which requires CEMS and QA/QC plans.

<sup>q</sup> Assumes 40 hours to train personnel and 16 hours for an annual refresher course.

<sup>r</sup> We assume that costs associated with elimination of the SSM exemption include time for re-evaluating previously developed plans. Costs associated with the use of electronic reporting and include time to become familiar with CEDRI and the semi-annual reporting requirements.

<sup>s</sup> Responses in year one associated with the use of electronic reporting include becoming familiar with CEDRI and the semi-annual reporting requirements.

<sup>t</sup> Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.



0	0	\$0
0	0	\$0
0	0	\$0
0	0	\$0
0	0	\$0
0	0	\$0
1.15	2.3	\$3,013
0	0.0	\$0
0	0	\$0
0	0	\$0
0	0	\$0
0	0	\$0
0	0	\$0
0	0	\$0
<b>26</b>		<b>\$3,013</b>
<b>654</b>		<b>\$75,000</b>
		<b>\$247,000</b>
		<b>\$322,000</b>

year period of this ICR.

technical labor, and \$57.02 per hour for Clerical  
 y Occupational and Industry Group.” The rates  
 those employed by private industry.

already have a testing requirement in their

sions averaging.

failure and re-test rate ( $12 \times 0.05 = 0.6$ ).

s.

included in the rule.

ed SSM record systems in year one. Costs  
il reporting form.

i-annual reporting form.

**Table 4 - Summary of Annual Respondent Burden and Cost - NESHAP for Miscellaneous Coating Manufacturing (40 CFR Part 63, Subpart HHHHH) (Amendments)**

Year	Technical Hours	Management Hours	Clerical Hours	Total Labor Hours	Labor Costs	Non-Labor (Capital/Startup and O&M) Costs
1	883	44	88	1,015	\$116,000	\$0
2	23	1	2	26	\$3,000	\$0
3	569	28	57	654	\$75,000	\$247,000
Total	1,475	74	148	1,696	\$194,000	\$247,000
Average	492	25	49.2	565	\$65,000	\$82,000

Year	Number of Respondents	Number of Responses	Reporting Hours	Recordkeeping Hours	Total Hours	Hours per Response
1	43	175	198	818	1,015	6.0
2	43	46	0	26	26	-
3	43	85	628	26	654	8
Total	-	306	826	871	1,696	-
Average	43	102	275	290	565	5.5

Average annual additional costs per respondent: \$3,420

Average annual additional hours per respondent: 13.1

Average annual additional hours per response: 5.5

1g

Total Costs
\$116,000
\$3,000
\$322,000
\$441,000
\$147,000
Hours Per Respondent
24
1
15
39
13.1

**Table 5: Average Annual EPA Burden and Cost - NESHAP for Miscellaneous Coating Manufact Subpart HHHHH) (Amendments)**

**Year 1**

Activity	(A) EPA Hours per Occurrence	(B) Number of Occurrences per Year	(C) EPA Hours per Year (AxB)	(D) Plants per Year <sup>a</sup>	(E) Technical Hours per Year (CxD)
Notifications/Reports					
A. Review Notification of Construction/Reconstruction	2	1	2	0	0
B. Review Notification of Anticipated Startup	2	1	2	0	0
C. Review Notification of Actual Startup	2	1	2	0	0
D. Review Notification of Applicability of Standard	2	1	2	0	0
E. Review Notification of Performance Test	2	1	2	0	0
F. Review Performance Test Report <sup>c</sup>	8	1	8	0	0
G. Review Repeat Performance Test Report <sup>d</sup>	8	1	8	0	0
H. Review Notification of Initial CMS Performance Evaluation <sup>e</sup>	2	1	2	0	0
I. CMS Performance Evaluation <sup>e</sup>	4	1	4	0	0
J. Review Emissions Averaging Plan <sup>f</sup>	12	1	12	0	0
K. Review Pre-compliance Report <sup>g</sup>	2	1	2	0	0
L. Review Notification of Compliance Status <sup>h</sup>					
i. With performance test	4	1	4	0	0
ii. Without performance test	4	1	4	0	0
M. Review Notification of Process Change <sup>i</sup>	6	1	6	0	0
N. Review Semiannual Compliance Report <sup>j</sup>					
i. No deviations	2	1	2	0	0
ii. Deviations	4	1	4	0	0
O. Startup, shutdown, and malfunction report <sup>l</sup>	2	1	2	0	0
R. LDAR report <sup>m</sup>	2	1	2	0	0
S. Emissions averaging report <sup>f</sup>	4	1	4	0	0
T. Review record systems due to SSM revisions <sup>n</sup>	2	2	4	43	172
<b>TOTAL (rounded) <sup>n</sup></b>					

**Assumptions:**

<sup>a</sup> There are 43 existing major source facilities subject to the NESHAP. No new sources are expected to become subject over the three-year period.

<sup>b</sup> This cost is based on the following hourly labor rates times a 1.6 benefits multiplication factor to account for government overhead expenses: Technical and \$26.38 for Clerical. These rates are from the Office of Personnel Management (OPM) “2018 General Schedule” which excludes overtime.

<sup>c</sup> Assumes that the 12 facilities without periodic testing requirements in their permits will do performance testing in year 3. All facilities calculations based on: materials usage, materials HAP content, and control efficiency from testing (if applicable).

<sup>d</sup> Assume a 5% failure and re-test rate (12 x 0.05 = 0.6, rounded up to 1).

<sup>e</sup> Assumes no performance evaluations are required for the parameter monitoring systems included in the rule.

<sup>f</sup> Assumes that all existing facilities have already submitted emissions averaging plans.

<sup>g</sup> Assumes 50 percent of the new facilities will submit a pre-compliance report.

<sup>h</sup> Assumes all facilities will comply by submitting engineering calculations, design calculations, etc. with no performance tests.

- <sup>i</sup>. Assumes 10 percent of the facilities will implement process changes.
- <sup>j</sup>. Assumes 10 percent will have deviations.
- <sup>l</sup>. Assumes 5% of all facilities will report actions taken during a startup, shutdown, or malfunction is not consistent with the plan.
- <sup>m</sup>. Assumes all facilities will be subject to the equipment leak standards.
- <sup>n</sup>. These are costs associated with evaluating new SSM record systems in year one.
- <sup>o</sup>. Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.





**Table 6: Average Annual EPA Burden and Cost - NESHAP for Miscellaneous Coating Manufact Subpart HHHHH) (Amendments)**

**Year 2**

Activity	(A) EPA Hours per Occurrence	(B) Number of Occurrences per Year	(C) EPA Hours per Year (AxB)	(D) Plants per Year <sup>a</sup>	(E) Technical Hours per Year (CxD)
Notifications/Reports					
A. Review Notification of Construction/Reconstruction	2	1	2	0	0
B. Review Notification of Anticipated Startup	2	1	2	0	0
C. Review Notification of Actual Startup	2	1	2	0	0
D. Review Notification of Applicability of Standard	2	1	2	0	0
E. Review Notification of Performance Test	2	1	2	0	0
F. Review Performance Test Report <sup>c</sup>	8	1	8	0	0
G. Review Repeat Performance Test Report <sup>d</sup>	8	1	8	0	0
H. Review Notification of Initial CMS Performance Evaluation <sup>e</sup>	2	1	2	0	0
I. CMS Performance Evaluation <sup>e</sup>	4	1	4	0	0
J. Review Emissions Averaging Plan <sup>f</sup>	12	1	12	0	0
K. Review Pre-compliance Report <sup>g</sup>	2	1	2	0	0
L. Review Notification of Compliance Status <sup>h</sup>					
i. With performance test	4	1	4	0	0
ii. Without performance test	4	1	4	0	0
M. Review Notification of Process Change <sup>i</sup>	6	1	6	0	0
N. Review Semiannual Compliance Report <sup>j</sup>					
i. No deviations	2	1	2	0	0
ii. Deviations	4	1	4	0	0
O. Startup, shutdown, and malfunction report <sup>l</sup>	2	1	2	0	0
R. LDAR report <sup>m</sup>	2	1	2	0	0
S. Emissions averaging report <sup>f</sup>	4	1	4	0	0
T. Review record systems due to SSM revisions <sup>n</sup>	2	2	4	0	0
<b>TOTAL (rounded) <sup>n</sup></b>					

**Assumptions:**

<sup>a</sup> There are 43 existing major source facilities subject to the NESHAP. No new sources are expected to become subject over the three-year period.

<sup>b</sup> This cost is based on the following hourly labor rates times a 1.6 benefits multiplication factor to account for government overhead expenses: Technical and \$26.38 for Clerical. These rates are from the Office of Personnel Management (OPM) “2018 General Schedule” which excludes overtime.

<sup>c</sup> Assumes that the 12 facilities without periodic testing requirements in their permits will do performance testing in year 3. All facilities calculations based on: materials usage, materials HAP content, and control efficiency from testing (if applicable).

<sup>d</sup> Assume a 5% failure and re-test rate (12 x 0.05 = 0.6, rounded up to 1).

<sup>e</sup> Assumes no performance evaluations are required for the parameter monitoring systems included in the rule.

<sup>f</sup> Assumes that all existing facilities have already submitted emissions averaging plans.

<sup>g</sup> Assumes 50 percent of the new facilities will submit a pre-compliance report.

<sup>h</sup> Assumes all facilities will comply by submitting engineering calculations, design calculations, etc. with no performance tests.

- <sup>i</sup>. Assumes 10 percent of the facilities will implement process changes.
- <sup>j</sup>. Assumes 10 percent will have deviations.
- <sup>l</sup>. Assumes 5% of all facilities will report actions taken during a startup, shutdown, or malfunction is not consistent with the plan.
- <sup>m</sup>. Assumes all facilities will be subject to the equipment leak standards.
- <sup>n</sup>. These are costs associated with evaluating new SSM record systems in year one.
- <sup>o</sup>. Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.





**Table 7: Average Annual EPA Burden and Cost - NESHAP for Miscellaneous Coating Manufact Subpart HHHHH) (Amendments)**

**Year 3**

Activity	(A) EPA Hours per Occurrence	(B) Number of Occurrences per Year	(C) EPA Hours per Year (AxB)	(D) Plants per Year <sup>a</sup>	(E) Technical Hours per Year (CxD)
Notifications/Reports					
A. Review Notification of Construction/Reconstruction	2	1	2	0	0
B. Review Notification of Anticipated Startup	2	1	2	0	0
C. Review Notification of Actual Startup	2	1	2	0	0
D. Review Notification of Applicability of Standard	2	1	2	0	0
E. Review Notification of Performance Test	2	1	2	13	26
F. Review Performance Test Report <sup>c</sup>	8	1	8	12	96
G. Review Repeat Performance Test Report <sup>d</sup>	8	1	8	1	8
H. Review Notification of Initial CMS Performance Evaluation <sup>e</sup>	2	1	2	0	0
I. CMS Performance Evaluation <sup>e</sup>	4	1	4	0	0
J. Review Emissions Averaging Plan <sup>f</sup>	12	1	12	0	0
K. Review Pre-compliance Report <sup>g</sup>	2	1	2	0	0
L. Review Notification of Compliance Status <sup>h</sup>					
i. With performance test	4	1	4	0	0
ii. Without performance test	4	1	4	0	0
M. Review Notification of Process Change <sup>i</sup>	6	1	6	0	0
N. Review Semiannual Compliance Report <sup>j</sup>					
i. No deviations	2	1	2	0	0
ii. Deviations	4	1	4	0	0
O. Startup, shutdown, and malfunction report <sup>l</sup>	2	1	2	0	0
R. LDAR report <sup>m</sup>	2	1	2	0	0
S. Emissions averaging report <sup>f</sup>	4	1	4	0	0
T. Review record systems due to SSM revisions <sup>n</sup>	2	2	4	0	0
<b>TOTAL (rounded) <sup>n</sup></b>					

**Assumptions:**

<sup>a</sup> There are 43 existing major source facilities subject to the NESHAP. No new sources are expected to become subject over the three-year period.

<sup>b</sup> This cost is based on the following hourly labor rates times a 1.6 benefits multiplication factor to account for government overhead expenses: \$26.38 for Technical and \$26.38 for Clerical. These rates are from the Office of Personnel Management (OPM) “2018 General Schedule” which excludes overtime.

<sup>c</sup> Assumes that the 12 facilities without periodic testing requirements in their permits will do performance testing in year 3. All facilities calculations based on: materials usage, materials HAP content, and control efficiency from testing (if applicable).

<sup>d</sup> Assume a 5% failure and re-test rate (12 x 0.05 = 0.6, rounded up to 1).

<sup>e</sup> Assumes no performance evaluations are required for the parameter monitoring systems included in the rule.

<sup>f</sup> Assumes that all existing facilities have already submitted emissions averaging plans.

<sup>g</sup> Assumes 50 percent of the new facilities will submit a pre-compliance report.

<sup>h</sup> Assumes all facilities will comply by submitting engineering calculations, design calculations, etc. with no performance tests.

- <sup>i</sup>. Assumes 10 percent of the facilities will implement process changes.
- <sup>j</sup>. Assumes 10 percent will have deviations.
- <sup>l</sup>. Assumes 5% of all facilities will report actions taken during a startup, shutdown, or malfunction is not consistent with the plan.
- <sup>m</sup>. Assumes all facilities will be subject to the equipment leak standards.
- <sup>n</sup>. These are costs associated with evaluating new SSM record systems in year one.
- <sup>o</sup>. Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.





**Table 8 - Summary of Annual Agency Burden and Cost - NESHAP for Miscellaneous (40 CFR Part 63, Subpart HHHHH) (Amendments)**

Year	Technical Hours	Management Hours	Clerical Hours	Total Hours	Labor Costs
1	172	9	17	198	\$9,400
2	0	0	0	0	\$0
3	130	7	13	150	\$7,100
Total	302	15.1	30.2	347	\$16,500
Average	100.7	5.0	10.1	116	\$5,500

Year	Number of Responses	Total Hours
1	86	198
2	0	0
3	26	150
Total	112	347
Average	37.3	116

Average annual hours per response:

3.1

**is Coating Manufacturing**

Non-Labor Costs	Total Costs
\$0	\$9,400
\$0	\$0
\$0	\$7,100
\$0	\$16,500
\$0	\$5,500

**Capital/Startup vs. Operation and Maintenance (O&M) Costs**

(A)	(B)	(C)	(D)	(E)	(F)
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	Number of Respondents with O&M
Performance Testing	\$19,000	12 + 1	\$247,000	\$0	0
Totals (rounded)			\$247,000		

Note: In year 3, twelve sources test one control device each at a cost of \$19,000. One re-test is done at a cost of \$19 have been rounded to three significant figures.

(G) Total O&M, (E x F)
\$0
\$0

Total

\$247,000

,000 each. Totals