Table 1: Annual Respondent Burden and Cost – NESHAP for Plastic Parts and Products Su PPPP) (Amendments)

# Year 1

|   | (A)                               |   | (C)  |   |
|---|-----------------------------------|---|--|---|
|   | Person<br>hours per<br>occurrence | (B) Number<br>of<br>occurrences<br>per year | Person hrs<br>per<br>respondent<br>per year<br>(C=AxB) | (D)<br>Respondents<br>per year <sup>a</sup> |
| 1. Reporting requirements   |                                   |   |  |   |
| a. Familiarization with the regulatory requirements   | 4                                 | 1   | 4  | 125   |
| b. Process/review information   | 4                                 | 4   | 16   | 0   |
| c. Required activities  |                                   |   |  |   |
| i. Add-on control performance test <sup>c</sup>   | 30                                | 1   | 30   | 0   |
| ii. Repeat add-on control performance test <sup>c</sup>                                       | 30                                | 1   | 30   | 0   |
| d. Write reports  |                                   |   |  |   |
| i. Initial notification   | 2                                 | 1   | 2  | 0   |
| ii. Notification of compliance status   | 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 initial performance test/add-on control performance test <sup>c,d</sup>    | 2                                 | 1   | 2  | 0   |
| vi. Report of initial performance test/add-on control performance test <sup>c,d</sup>         | 10                                | 1   | 10   | 0   |
| vii. Semiannual report <sup>e</sup>   | 6                                 | 2   | 12   | 0   |
| viii. Excess emissions report   | 2                                 | 2   | 4  | 0   |
| ix. Startup, shutdown, malfunction report <sup>f</sup>  | 2                                 | 1   | 2  | 0   |
| Subtotal for Reporting Requirements   |                                   |   |  |   |
| 2. Recordkeeping requirements   |                                   |   |  |   |
| a. Familiarization with the regulatory requirements   | See 1.a.                          |   |  |   |
| b. Plan activities  | 12                                | 1   | 12   | 0   |
| c. Implement activities   | 12                                | 1   | 12   | 0   |
| d. Maintain record system for material used   | 20                                | 1   | 20   | 0   |
| e. Time to enter information  |                                   |   |  |   |
| i. Material usage <sup>g</sup>  | 0.5                               | 365   | 182.5  | 0   |
| ii. Compliance calculation <sup>h</sup>   | 2                                 | 12  | 24   | 0   |
| f. Time to train personnel  | 10                                | 1   | 10   | 0   |
| g. Store, file, and maintain records i  | 2                                 | 12  | 24   | 0   |
| h. Retrieve records/reports <sup>j</sup>  | 1                                 | 12  | 12   | 0   |
| i. Revise record systems due to SSM revisions k   | 8                                 | 1   | 8  | 125   |
| j. Become familiar with CEDRI for electronic filing of notifications and reports <sup>1</sup> | 8                                 | 1   | 8  | 125   |
| Subtotal for Recordkeeping Requirements   |                                   |   |  |   |
| Total Labor Burden and Cost (rounded) <sup>m</sup>  |                                   |   |  |   |
| Total Capital and O&M Cost (rounded) <sup>m</sup>   |                                   |   |  |   |
| Grand Total (rounded) <sup>m</sup>  |                                   |   |  |   |

- <sup>a</sup> We estimate that 125 existing sources will be subject to the rule over the three-year period of this ICR, and no new
- b This ICR uses the following labor rates: \$147.40 per hour for Executive, Administrative, and Managerial labor; \$11 for Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, June 2018 Industry group." The rates are from column 1, "Total Compensation." The rates have been increased by 110% to acc by private industry.
- <sup>c</sup> The performance test requirement will affect 3 facilities with add-on controls in the third year. The emission units whave a testing requirement in their permits. We assume a 5% failure and re-test rate (3 x 0.05 = 0.15). Since the fraction re-tests will be done.
- d New sources have an initial testing requirement, but we assume no new sources will become subject during the three
- <sup>e</sup> We assume that each respondent will take 6 hours twice per year to write the semiannual report.
- f It is estimated that 25 percent of facilities using add-on controls submit startup, shutdown, and malfunction report o
- <sup>g</sup> We assumed that each respondent will take 0.5 hours each day to enter daily records of mass fraction of organic HA mass fraction of coating solids for each coating.
- <sup>h</sup> We have assumed that each respondent will take 2 hours once per month to enter compliance calculations.
- <sup>i</sup> We have assumed that each respondent will take 2 hours once per month to store, file and maintain records.
- <sup>j</sup> We have assumed that each respondent will take 1 hour once per month to retrieve records/reports.
- <sup>k</sup> We assume that costs associated with elimination of the SSM exemption include time for re-evaluating previously d
- <sup>1</sup> Responses in year one associated with the use of electronic reporting include becoming familiar with CEDRI and the
- <sup>m</sup> Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

# rface Coating (40 CFR Part 63, Subpart

|   | (E)<br>Technical<br>person hrs<br>per year<br>(E=CxD) | (F) Manage- ment person hrs per year (F=Ex0.05) | (G)<br>Clerical<br>person hrs<br>per year<br>(G=Ex0.1) | (H)<br>Cost per year (\$) <sup>b</sup> |
|---|---|---|--|--|
|   |   |   |  |  |
|   | 500   | 25  | 50   | \$65,496.00                            |
|   | 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                                    |
| İ | 0   | 0   | 0  | \$0                                    |
| İ | 0   | 0   | 0  | \$0                                    |
| İ | 0   | 0   | 0  | \$0                                    |
| İ |   | 575   |  | \$65,496                               |
| ı |   |   |  | -                                      |
| İ |   |   |  |  |
| ı | 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                                    |
| 1 | 1,000   | 50  | 100  | \$130,992.00                           |
|   | 1,000   | 50  | 100  | \$130,992.00                           |
| l |   | \$261,984                                       |  |  |
| Ì |   | 2,300<br>2,880                                  |  | \$327,000                              |
| 1 |   |   |  | \$0                                    |
| l |   |   |  | \$327,000                              |
| 1 |   | l   |  | 43=1,300                               |

| Labor Rates: |          |  |  |  |
|--------------|----------|--|--|--|
| Management   | \$147.40 |  |  |  |
| Technical    | \$117.92 |  |  |  |
| Clerical     | \$57.02  |  |  |  |

sources will become subject.

17.92 per hour for Technical labor, and \$57.02 per hour , "Table 2. Civilian Workers, by Occupational and ount for the benefit packages available to those employed

ith add-on controls at these 3 facilities do not already on of re-tests (0.15) rounds down to zero, we assume no

:-year period of this ICR.

nce per year.

.P for each coating, thinner, or cleaning material, and

eveloped SSM record systems in year one.

e semi-annual reporting form.

Table 2: Annual Respondent Burden and Cost – NESHAP for Plastic Parts and Products Su PPPP) (Amendments)

### Year 2

| Burden Item   |          | (B) Number<br>of<br>occurrences<br>per year | (C) Person hrs per respondent per year (C=AxB) | (D)<br>Respondents<br>per year <sup>a</sup> |  |
|---|----------|---|--|---|--|
| 1. Reporting requirements   |          |   |  |   |  |
| a. Familiarization with the regulatory requirements   | 4        | 1   | 4  | 0   |  |
| b. Process/review information   | 4        | 4   | 16   | 0   |  |
| c. Required activities  |          |   |  |   |  |
| i. Add-on control performance test <sup>c</sup>   | 30       | 1   | 30   | 0   |  |
| ii. Repeat add-on control performance test <sup>c</sup>                                       | 30       | 1   | 30   | 0   |  |
| d. Write reports  |          |   |  |   |  |
| i. Initial notification   | 2        | 1   | 2  | 0   |  |
| ii. Notification of compliance status   | 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 initial performance test/add-on control performance test <sup>c,d</sup>    | 2        | 1   | 2  | 0   |  |
| vi. Report of initial performance test/add-on control performance test <sup>c,d</sup>         | 10       | 1   | 10   | 0   |  |
| vii. Semiannual report <sup>e</sup>   | 6        | 2   | 12   | 0   |  |
| viii. Excess emissions report   | 2        | 2   | 4  | 0   |  |
| ix. Startup, shutdown, malfunction report <sup>f</sup>  | 2        | 1   | 2  | 0   |  |
| Subtotal for Reporting Requirements   |          |   |  |   |  |
| 2. Recordkeeping requirements   |          |   |  |   |  |
| a. Familiarization with the regulatory requirements   | See 1.a. |   |  |   |  |
| b. Plan activities  | 12       | 1   | 12   | 0   |  |
| c. Implement activities   | 12       | 1   | 12   | 0   |  |
| d. Maintain record system for material used   | 20       | 1   | 20   | 0   |  |
| e. Time to enter information  |          |   |  |   |  |
| i. Material usage <sup>g</sup>  | 0.5      | 365   | 182.5  | 0   |  |
| ii. Compliance calculation h  | 2        | 12  | 24   | 0   |  |
| f. Time to train personnel  | 10       | 1   | 10   | 0   |  |
| g. Store, file, and maintain records <sup>i</sup>   | 2        | 12  | 24   | 0   |  |
| h. Retrieve records/reports <sup>j</sup>  | 1        | 12  | 12   | 0   |  |
| i. Revise record systems due to SSM revisions k   | 8        | 1   | 8  | 0   |  |
| j. Become familiar with CEDRI for electronic filing of notifications and reports <sup>1</sup> | 8        | 1   | 8  | 0   |  |
| Subtotal for Recordkeeping Requirements   |          |   |  |   |  |
| Total Labor Burden and Cost (rounded) <sup>m</sup>  |          |   |  |   |  |
| Total Capital and O&M Cost (rounded) <sup>m</sup>   |          |   |  |   |  |
| Grand Total (rounded) <sup>m</sup>  |          |   |  |   |  |

- <sup>a</sup> We estimate that 125 existing sources will be subject to the rule over the three-year period of this ICR, and no new
- <sup>b</sup> This ICR uses the following labor rates: \$147.40 per hour for Executive, Administrative, and Managerial labor; \$11 for Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, June 2018 Industry group." The rates are from column 1, "Total Compensation." The rates have been increased by 110% to acc by private industry.
- <sup>c</sup> The performance test requirement will affect 3 facilities with add-on controls in the third year. The emission units whave a testing requirement in their permits. We assume a 5% failure and re-test rate ( $3 \times 0.05 = 0.15$ ). Since the fraction re-tests will be done.
- <sup>d</sup> New sources have an initial testing requirement, but we assume no new sources will become subject during the three
- <sup>e</sup> We assume that each respondent will take 6 hours twice per year to write the semiannual report.
- <sup>f</sup> It is estimated that 25 percent of facilities using add-on controls submit startup, shutdown, and malfunction report o
- <sup>g</sup> We assumed that each respondent will take 0.5 hours each day to enter daily records of mass fraction of organic HA mass fraction of coating solids for each coating.
- h We have assumed that each respondent will take 2 hours once per month to enter compliance calculations.
- <sup>i</sup> We have assumed that each respondent will take 2 hours once per month to store, file and maintain records.
- <sup>j</sup> We have assumed that each respondent will take 1 hour once per month to retrieve records/reports.
- <sup>k</sup> We assume that costs associated with elimination of the SSM exemption include time for re-evaluating previously d
- Responses in year one associated with the use of electronic reporting include becoming familiar with CEDRI and the
- <sup>m</sup> Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

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| (E)<br>Technical<br>person hrs<br>per year<br>(E=CxD) | (F) Manage- ment person hrs per year (F=Ex0.05) | (G)<br>Clerical<br>person hrs<br>per year<br>(G=Ex0.1) | (H)<br>Cost per year (\$) <sup>b</sup> |
|---|---|--|--|
|   |   |  |  |
| 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   | 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  |  |
|   | , v   | U  | \$0                                    |
| 0   | 0   | 0  | \$0                                    |
|   | 0   | \$0<br>\$0   |  |
|   | 0   |  |  |
|   | <u> </u>  |  | \$0                                    |
|   |   |  | \$0                                    |
|   |   |  | \$0                                    |

| Labor Rates: |          |  |  |
|--------------|----------|--|--|
| Management   | \$147.40 |  |  |
| Technical    | \$117.92 |  |  |
| Clerical     | \$57.02  |  |  |

sources will become subject.

17.92 per hour for Technical labor, and \$57.02 per hour , "Table 2. Civilian Workers, by Occupational and ount for the benefit packages available to those employed

ith add-on controls at these 3 facilities do not already on of re-tests (0.15) rounds down to zero, we assume no

:-year period of this ICR.

nce per year.

P for each coating, thinner, or cleaning material, and

eveloped SSM record systems in year one.

e semi-annual reporting form.

Table 3: Annual Respondent Burden and Cost – NESHAP for Plastic Parts and Products Su PPPP) (Amendments)

### Year 3

| Burden Item   | (A)<br>Person<br>hours per<br>occurrence | (B) Number<br>of<br>occurrences<br>per year | (C) Person hrs per respondent per year (C=AxB) | (D)<br>Respondents<br>per year <sup>a</sup> |  |
|---|--|---|--|---|--|
| 1. Reporting requirements   |  |   |  |   |  |
| a. Familiarization with the regulatory requirements   | 4  | 1   | 4  | 0   |  |
| b. Process/review information   | 4  | 4   | 16   | 0   |  |
| c. Required activities  |  |   |  |   |  |
| i. Add-on control performance test <sup>c</sup>   | 30                                       | 1   | 30   | 3   |  |
| ii. Repeat add-on control performance test <sup>c</sup>                                       | 30                                       | 1   | 30   | 0   |  |
| d. Write reports  |  |   |  |   |  |
| i. Initial notification   | 2  | 1   | 2  | 0   |  |
| ii. Notification of compliance status   | 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 initial performance test/add-on control performance test <sup>c,d</sup>    | 2  | 1   | 2  | 3   |  |
| vi. Report of initial performance test/add-on control performance test <sup>c,d</sup>         | 10                                       | 1   | 10   | 3   |  |
| vii. Semiannual report <sup>e</sup>   | 6  | 2   | 12   | 0   |  |
| viii. Excess emissions report   | 2  | 2   | 4  | 0   |  |
| ix. Startup, shutdown, malfunction report <sup>f</sup>  | 2  | 1   | 2  | 0   |  |
| Subtotal for Reporting Requirements   |  |   |  |   |  |
| 2. Recordkeeping requirements   |  |   |  |   |  |
| a. Familiarization with the regulatory requirements   | See 1.a.                                 |   |  |   |  |
| b. Plan activities  | 12                                       | 1   | 12   | 0   |  |
| c. Implement activities   | 12                                       | 1   | 12   | 0   |  |
| d. Maintain record system for material used   | 20                                       | 1   | 20   | 0   |  |
| e. Time to enter information  |  |   |  |   |  |
| i. Material usage <sup>g</sup>  | 0.5                                      | 365   | 182.5  | 0   |  |
| ii. Compliance calculation h  | 2  | 12  | 24   | 0   |  |
| f. Time to train personnel  | 10                                       | 1   | 10   | 0   |  |
| g. Store, file, and maintain records i  | 2  | 12  | 24   | 0   |  |
| h. Retrieve records/reports <sup>j</sup>  | 1,                                       | 12  | 12   | 0   |  |
| i. Revise record systems due to SSM revisions k   | 8  | 1   | 8  | 0   |  |
| j. Become familiar with CEDRI for electronic filing of notifications and reports <sup>1</sup> | 8  | 1   | 8  | 0   |  |
| Subtotal for Recordkeeping Requirements   |  |   |  |   |  |
| Total Labor Burden and Cost (rounded) <sup>m</sup>  |  |   |  |   |  |
| Total Capital and O&M Cost (rounded) <sup>m</sup>   |  |   |  |   |  |
| Grand Total (rounded) <sup>m</sup>  |  |   |  |   |  |

- <sup>a</sup> We estimate that 125 existing sources will be subject to the rule over the three-year period of this ICR, and no new
- <sup>b</sup> This ICR uses the following labor rates: \$147.40 per hour for Executive, Administrative, and Managerial labor; \$11 for Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, June 2018 Industry group." The rates are from column 1, "Total Compensation." The rates have been increased by 110% to acc by private industry.
- <sup>c</sup> The performance test requirement will affect 3 facilities with add-on controls in the third year. The emission units whave a testing requirement in their permits. We assume a 5% failure and re-test rate ( $3 \times 0.05 = 0.15$ ). Since the fraction re-tests will be done.
- <sup>d</sup> New sources have an initial testing requirement, but we assume no new sources will become subject during the three
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- <sup>1</sup> Responses in year one associated with the use of electronic reporting include becoming familiar with CEDRI and the
- <sup>m</sup> Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

# rface Coating (40 CFR Part 63, Subpart

| (E) Technical person hrs per year (E=CxD) | (F)<br>Manage-<br>ment<br>person hrs<br>per year<br>(F=Ex0.05) | (G)<br>Clerical<br>person hrs<br>per year<br>(G=Ex0.1) | (H)<br>Cost per year (\$) <sup>b</sup> |  |  |
|---|--|--|--|--|--|
|   |  |  |  |  |  |
| 0   | 0  | 0  | \$0                                    |  |  |
| 0   | 0  | 0  | \$0                                    |  |  |
|   |  |  |  |  |  |
| 90  | 4.5  | 9.0  | \$11,789.28                            |  |  |
| 0   | 0  | 0  | \$0                                    |  |  |
|   |  | 0  |  |  |  |
| 0   | 0  | 0  | \$0                                    |  |  |
| 0   | 0  | 0  | \$0                                    |  |  |
| 0   | 0  | 0  | \$0                                    |  |  |
| 0   | 0  | 0  | \$0                                    |  |  |
| 6   | 0.3  | 0.6  | \$785.95                               |  |  |
| 30  | 1.5  | 3.0  | \$3,929.76                             |  |  |
| 0   | 0  | 0  | \$0                                    |  |  |
| 0   | 0  | 0  | \$0                                    |  |  |
| 0.0                                       | 0  | 0  | \$0                                    |  |  |
|   | 145  |  | \$16,505                               |  |  |
|   |  |  |  |  |  |
|   |  |  |  |  |  |
| 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  |  |  |  |  |
|   | 145  |  | \$0<br>\$16,500                        |  |  |
|   |  |  | \$57,000                               |  |  |
|   |  |  | \$73,500                               |  |  |
|   | <u> </u>   | l  | ψ, 5,500                               |  |  |

| Labor Rates: |          |  |  |  |
|--------------|----------|--|--|--|
| Management   | \$147.40 |  |  |  |
| Technical    | \$117.92 |  |  |  |
| Clerical     | \$57.02  |  |  |  |

sources will become subject.

17.92 per hour for Technical labor, and \$57.02 per hour , "Table 2. Civilian Workers, by Occupational and ount for the benefit packages available to those employed

ith add-on controls at these 3 facilities do not already on of re-tests (0.15) rounds down to zero, we assume no

-year period of this ICR.

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.P for each coating, thinner, or cleaning material, and

eveloped SSM record systems in year one.

e semi-annual reporting form.

Table 4 - Summary of Annual Respondent Burden and Cost - NESHAP for Plastic Parts a (40 CFR Part 63, Subpart PPPP) (Amendments)

| Year    | Technical Hours | Management<br>Hours | Clerical Hours | Total Labor Hours | Labor Costs |
|---------|-----------------|---------------------|----------------|-------------------|-------------|
| 1       | 2,500           | 125                 | 250            | 2,875             | \$327,000   |
| 2       | 0               | 0                   | 0              | 0                 | \$0         |
| 3       | 126             | 6                   | 13             | 145               | \$16,500    |
| Total   | 2,626           | 131                 | 263            | 3,020             | \$344,000   |
| Average | 875             | 44                  | 87.5           | 1,007             | \$115,000   |

|         | Number of   | Number of |                 | Recordkeeping |             |
|---------|-------------|-----------|-----------------|---------------|-------------|
| Year    | Respondents | Responses | Reporting Hours | Hours         | Total Hours |
| 1       | 125         | 375       | 575             | 2,300         | 2,875       |
| 2       | 125         | 0         | 0               | 0             | 0           |
| 3       | 125         | 9         | 145             | 0             | 145         |
| Total   | -           | 384       | 720             | 2,300         | 3,020       |
| Average | 125         | 128       | 240             | 767           | 1,007       |

Average annual additional costs per respondent:

Average annual additional hours per respondent:

Average annual additional hours per response:

\$1,070

8.1 7.9

# nd Products Surface Coating

| Non-Labor<br>(Capital/Startup<br>and O&M) Costs | Total Costs |
|---|-------------|
| \$0   | \$327,000   |
| \$0   | \$0         |
| \$57,000  | \$73,500    |
| \$57,000  | \$401,000   |
| \$19,000  | \$134,000   |
|   |             |

| Hours per<br>Response | Hours Per<br>Respondent |
|-----------------------|-------------------------|
| 8.0                   | 23.0                    |
| -                     | 0.0                     |
| 16                    | 1.2                     |
| -                     | 24.2                    |
| 7.9                   | 8.1                     |
| 7.9                   |                         |

# Table 5: Average Annual EPA Burden and Cost - NESHAP for Plastic Parts and Product 63, Subpart PPPP) (Amendments)

#### Year 1

| Burden Item  | (A)<br>EPA Person<br>hours per<br>occurrence | (B)<br>Number of<br>occurrences<br>per year | (C)<br>EPA Person<br>hrs per<br>plant per<br>year<br>(C=AxB) | (D)<br>Plants per<br>year <sup>a</sup> | (E)<br>Technical<br>person hrs<br>per year<br>(E=CxD) |
|--|--|---|--|--|---|
| 1. Initial performance test <sup>c</sup>   | 24   | 1   | 24   | 0                                      | 0   |
| 2. Repeat performance test <sup>c</sup>  | 24   | 0.05  | 1.2  | 0                                      | 0   |
| 3. Report review   |  |   |  |  |   |
| a. Initial notification  | 8  | 1   | 8  | 0                                      | 0   |
| b. Notification of compliance status   | 8  | 1   | 8  | 0                                      | 0   |
| c. Notification of construction/reconstruction                                   | 8  | 1   | 8  | 0                                      | 0   |
| d. Notification of actual startup  | 8  | 1   | 8  | 0                                      | 0   |
| e. Notification of performance test/add-on control performance test <sup>d</sup> | 8  | 1   | 8  | 0                                      | 0   |
| f. Report of performance test/add-on control performance test <sup>d</sup>       | 8  | 1   | 8  | 0                                      | 0   |
| g. Semiannual report <sup>e</sup>  | 12   | 2   | 24   | 0                                      | 0   |
| h. Excess emissions report <sup>f</sup>  | 4  | 2   | 8  | 0                                      | 0   |
| i. Startup, shutdown, malfunction report   | 8  | 1   | 8  | 0                                      | 0   |
| Total (rounded): <sup>g</sup>  |  |   |  |  |   |

- <sup>a</sup> We estimate that 125 existing sources will be subject to the rule over the three-year period of this ICR, and no n
- <sup>b</sup> This cost is based on the following labor rates which incorporates a 1.6 benefits multiplication factor to account Managerial rate of \$65.71 (GS-13, Step 5, \$41.07 + 60%), Technical rate of \$48.75 (GS-12, Step 1, \$30.47 + 60% \$16.49 + 60%). These rates are from the Office of Personnel Management (OPM) "2018 General Schedule" which
- <sup>c</sup> We assume it will take 24 hours to complete the initial performance test review. Assume a 5% failure and re-test
- <sup>d</sup> Assumes that the 3 facilities without periodic testing requirements in their permits will do performance testing of year 3. We assume a 5% failure and re-test rate ( $3 \times 0.05 = 0.15$ ). Since the fraction of re-tests (0.15) rounds down
- <sup>e</sup> We have assumed that it will take 12 hours two times per year to review the semiannual report.
- <sup>f</sup> We have assumed that it will take 4 hours two times per year to review the excess emissions report.
- <sup>g</sup> Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

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|   | 1  |   |
|---|--|---|
| (F) Management person hrs per year (F=Ex0.05) | (G)<br>Clerical<br>person hrs<br>per year<br>(G=Ex0.1) | (H)<br>Cost per year<br>(\$) <sup>b</sup> |
| 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                                       |

| Labor Rates: |         |  |
|--------------|---------|--|
| Management   | \$65.71 |  |
| Technical    | \$48.75 |  |
| Clerical     | \$26.38 |  |

ew sources will become subject.

for government overhead expenses: ), and Clerical rate of \$26.38 (GS-6, Step 3, h excludes locality rates of pay.

rate.

the emission units with add-on controls in to zero, we assume no re-tests will be done.

# Table 6: Average Annual EPA Burden and Cost - NESHAP for Plastic Parts and Product 63, Subpart PPPP) (Amendments)

#### Year 2

| Burden Item  | (A)<br>EPA Person<br>hours per<br>occurrence | (B)<br>Number of<br>occurrences<br>per year | (C) EPA Person hrs per plant per year (C=AxB) | (D)<br>Plants per<br>year <sup>a</sup> | (E)<br>Technical<br>person hrs<br>per year<br>(E=CxD) |
|--|--|---|---|--|---|
| 1. Initial performance test <sup>c</sup>   | 24   | 1   | 24  | 0                                      | 0   |
| 2. Repeat performance test <sup>c</sup>  | 24   | 0.05  | 1.2   | 0                                      | 0   |
| 3. Report review   |  |   |   |  |   |
| a. Initial notification  | 8  | 1   | 8   | 0                                      | 0   |
| b. Notification of compliance status   | 8  | 1   | 8   | 0                                      | 0   |
| c. Notification of construction/reconstruction                                   | 8  | 1   | 8   | 0                                      | 0   |
| d. Notification of actual startup  | 8  | 1   | 8   | 0                                      | 0   |
| e. Notification of performance test/add-on control performance test <sup>d</sup> | 8  | 1   | 8   | 0                                      | 0   |
| f. Report of performance test/add-on control performance test <sup>d</sup>       | 8  | 1   | 8   | 0                                      | 0   |
| g. Semiannual report <sup>e</sup>  | 12   | 2   | 24  | 0                                      | 0   |
| h. Excess emissions report <sup>f</sup>  | 4  | 2   | 8   | 0                                      | 0   |
| i. Startup, shutdown, malfunction report   | 8  | 1   | 8   | 0                                      | 0   |
| Total (rounded): <sup>g</sup>  |  |   |   |  |   |

- <sup>a</sup> We estimate that 125 existing sources will be subject to the rule over the three-year period of this ICR, and no n
- <sup>b</sup> This cost is based on the following labor rates which incorporates a 1.6 benefits multiplication factor to account Managerial rate of \$65.71 (GS-13, Step 5, \$41.07 + 60%), Technical rate of \$48.75 (GS-12, Step 1, \$30.47 + 60% \$16.49 + 60%). These rates are from the Office of Personnel Management (OPM) "2018 General Schedule" which
- <sup>c</sup> We assume it will take 24 hours to complete the initial performance test review. Assume a 5% failure and re-test
- <sup>d</sup> Assumes that the 3 facilities without periodic testing requirements in their permits will do performance testing of year 3. We assume a 5% failure and re-test rate ( $3 \times 0.05 = 0.15$ ). Since the fraction of re-tests (0.15) rounds down
- <sup>e</sup> We have assumed that it will take 12 hours two times per year to review the semiannual report.
- <sup>f</sup> We have assumed that it will take 4 hours two times per year to review the excess emissions report.
- <sup>g</sup>Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

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| (F) Management person hrs per year (F=Ex0.05) | (G)<br>Clerical<br>person hrs<br>per year<br>(G=Ex0.1) | (H)<br>Cost per year<br>(\$) <sup>b</sup> |
|---|--|---|
| 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                                       |

| Labor Rates: |         |  |  |
|--------------|---------|--|--|
| Management   | \$65.71 |  |  |
| Technical    | \$48.75 |  |  |
| Clerical     | \$26.38 |  |  |

ew sources will become subject.

for government overhead expenses: ), and Clerical rate of \$26.38 (GS-6, Step 3, h excludes locality rates of pay.

rate.

the emission units with add-on controls in to zero, we assume no re-tests will be done.

# Table 7: Average Annual EPA Burden and Cost - NESHAP for Plastic Parts and Products 63, Subpart PPPP) (Amendments)

#### Year 3

| Burden Item  | _  | (B)<br>Number of<br>occurrences<br>per year | l   | (D)<br>Plants per<br>year <sup>a</sup> | (E) Technical person hrs per year (E=CxD) |
|--|----|---|-----|--|---|
| 1. Initial performance test <sup>c</sup>   | 24 | 1   | 24  | 0                                      | 0   |
| 2. Repeat performance test <sup>c</sup>  | 24 | 0.05  | 1.2 | 0                                      | 0   |
| 3. Report review   |    |   |     |  |   |
| a. Initial notification  | 8  | 1   | 8   | 0                                      | 0   |
| b. Notification of compliance status   | 8  | 1   | 8   | 0                                      | 0   |
| c. Notification of construction/reconstruction                                   | 8  | 1   | 8   | 0                                      | 0   |
| d. Notification of actual startup  | 8  | 1   | 8   | 0                                      | 0   |
| e. Notification of performance test/add-on control performance test <sup>d</sup> | 8  | 1   | 8   | 3                                      | 24  |
| f. Report of performance test/add-on control performance test <sup>d</sup>       | 8  | 1   | 8   | 3                                      | 24  |
| g. Semiannual report <sup>e</sup>  | 12 | 2   | 24  | 0                                      | 0   |
| h. Excess emissions report <sup>f</sup>  | 4  | 2   | 8   | 0                                      | 0   |
| i. Startup, shutdown, malfunction report   | 8  | 1   | 8   | 0                                      | 0   |
| Total (rounded): <sup>g</sup>  |    |   |     |  |   |

<sup>&</sup>lt;sup>a</sup> We estimate that 125 existing sources will be subject to the rule over the three-year period of this ICR, and no ne

<sup>&</sup>lt;sup>b</sup> This cost is based on the following labor rates which incorporates a 1.6 benefits multiplication factor to account for Managerial rate of \$65.71 (GS-13, Step 5, \$41.07 + 60%), Technical rate of \$48.75 (GS-12, Step 1, \$30.47 + 60%), \$16.49 + 60%). These rates are from the Office of Personnel Management (OPM) "2018 General Schedule" which

 $<sup>^{\</sup>rm c}$  We assume it will take 24 hours to complete the initial performance test review. Assume a 5% failure and re-test ra

<sup>&</sup>lt;sup>d</sup> Assumes that the 3 facilities without periodic testing requirements in their permits will do performance testing of t year 3. We assume a 5% failure and re-test rate (3 x 0.05 = 0.15). Since the fraction of re-tests (0.15) rounds down t

<sup>&</sup>lt;sup>e</sup> We have assumed that it will take 12 hours two times per year to review the semiannual report.

<sup>&</sup>lt;sup>f</sup> We have assumed that it will take 4 hours two times per year to review the excess emissions report.

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

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| (F) Management person hrs per year (F=Ex0.05) | (G)<br>Clerical<br>person hrs<br>per year<br>(G=Ex0.1) | (H)<br>Cost per year<br>(\$) <sup>b</sup> |
|---|--|---|
| 0   | 0  | \$0                                       |
| 0   | 0  | \$0                                       |
|   |  |   |
| 0   | 0  | \$0                                       |
| 0   | 0  | \$0                                       |
| 0   | 0  | \$0                                       |
| 0   | 0  | \$0                                       |
| 1.2   | 2.4  | \$1,312.16                                |
| 1.2   | 2.4  | \$1,312.16                                |
| 0   | 0  | \$0                                       |
| 0   | 0  | \$0                                       |
| 0   | 0  | \$0                                       |
| 55  |  | \$2,620                                   |

| Labor Rates: |         |  |
|--------------|---------|--|
| Management   | \$65.71 |  |
| Technical    | \$48.75 |  |
| Clerical     | \$26.38 |  |

w sources will become subject.

or government overhead expenses: and Clerical rate of \$26.38 (GS-6, Step 3, excludes locality rates of pay.

ate.

the emission units with add-on controls in o zero, we assume no re-tests will be done.

Table 8 - Summary of Annual Agency Burden and Cost - NESHAP for Plastic Parts and P CFR Part 63, Subpart PPPP) (Amendments)

| Year    | Technical Hours | Management<br>Hours | Clerical Hours | Total Hours | Labor Costs |
|---------|-----------------|---------------------|----------------|-------------|-------------|
| 1       | 0               | 0                   | 0              | 0           | \$0         |
| 2       | 0               | 0                   | 0              | 0           | \$0         |
| 3       | 48              | 2                   | 5              | 55          | \$2,620     |
| Total   | 48              | 2.4                 | 4.8            | 55          | \$2,620     |
| Average | 16.0            | 0.8                 | 1.6            | 18          | \$870       |

| Year    | Number of<br>Responses | Total Hours |
|---------|------------------------|-------------|
| 1       | 0                      | 0           |
| 2       | 0                      | 0           |
| 3       | 6                      | 55          |
| Total   | 6                      | 55          |
| Average | 2                      | 18          |

Average annual hours per response:

# roducts Surface Coating (40

| Non-Labor Costs | Total Costs |
|-----------------|-------------|
| \$0             | \$0         |
| \$0             | \$0         |
| \$0             | \$2,620     |
| \$0             | \$2,620     |
| \$0             | \$870       |

|                     | Capital   | /Startup vs. Operat                       | ion and Maintenan | ce (O&M) Costs                         |
|---------------------|---|---|-------------------|--|
| (A)                 | (B)   | (C)                                       | (D)               | (E)                                    |
| Performance Testing | Capital Startup Cost<br>for One<br>Performance Test | Number of<br>Respondents Doing<br>Testing |                   | Annual O&M Costs<br>for One Respondent |
| Performance Testing | \$19,000  | 3   | \$57,000          | \$0                                    |
| Totals (rounded)    |   |   | \$57,000          |  |

Note: In year 3, three sources test one control device each at a cost of \$19,000. We assume a 5% failure rate for the rounds down to zero, we assume no cost for re-tests. Totals have been rounded to three significant figures.

| Number of Respondents |   |                                   |  |   |
|-----------------------|---|-----------------------------------|--|---|
|                       | Respondents That Submit Reports           |                                   | Respondents That<br>Do Not Submit Any<br>Reports |   |
|                       | (A)                                       | (B)                               | (C)  | (D)   |
| Year                  | Number of New<br>Respondents <sup>1</sup> | Number of Existing<br>Respondents |  | Number of Existing<br>Respondents That<br>Are Also New<br>Respondents |
|                       |   |                                   |  |   |
| 1                     | 0   | 125                               | 0  | 0   |
| 2                     | 0   | 125                               | 0  | 0   |
| 3                     | 0   | 125                               | 0  | 0   |
| Average               | 0   | 125                               | 0  | 0   |

<sup>&</sup>lt;sup>1</sup> New respondents include sources with constructed, reconstructed and modified affected facilities.

|                                      |                       | ]     |          |
|--------------------------------------|-----------------------|-------|----------|
| (F)                                  | (G)                   |       |          |
| Number of<br>Respondents with<br>O&M | Total O&M,<br>(E x F) |       |          |
| 0                                    | \$0                   | ]     |          |
|                                      | \$0                   | Total | \$57,000 |

test. Since the fraction of re-tests (0.15)

| (E)                                     |
|---|
| Number of<br>Respondents<br>(E=A+B+C-D) |
| 125                                     |
| 125                                     |
| 125                                     |
| 125                                     |
| 125                                     |