

Information Collection Request (ICR) Workbook for
NSPS Review for Surface Coating of Plastic Parts for
Business Machines (40 CFR Part 60, Subparts TTT and TTTa)

TABLES 1, 2, and 3

Annual Respondent Burden and Cost of Recordkeeping and Reporting Requirements for the
Surface Coating of Plastic Parts for Business Machines NSPS Review (Amendments) — Years 1–3

TABLE 4

Summary of Annual Respondent Burden and Cost of Recordkeeping and Reporting Requirements for the
Surface Coating of Plastic Parts for Business Machines NSPS Review (Amendments)

TABLES 5, 6, and 7

Annual Agency Burden and Cost of Recordkeeping and Reporting Requirements for the
Surface Coating of Plastic Parts for Business Machines NSPS Review (Amendments) — Years 1–3

TABLE 8

Summary of Annual Agency Burden and Cost of Recordkeeping and Reporting Requirements for the
Surface Coating of Plastic Parts for Business Machines NSPS Review (Amendments)

Respondent Wages (\$2021)		
Category (1)	Total compensation, Cost (2)	Loaded Wage (3)
Technical	\$59.02	\$123.95
Managerial	\$75.05	\$157.61
Clerical	\$29.77	\$62.52

Footnotes:

(1) The Wage categories "Technical," "Managerial," and "Clerical" refer to the series "Management, professional, and related: Professional and related," "Management, professional, and related: Management, business and financial," and "Sales and office: Office and administrative support," respectively, in the United States Department of Labor, Bureau of Labor Statistics table titled "Table 2. Employer Costs for Employee Compensation for civilian workers by occupational and industry group" and dated Sept. 2021: https://www.bls.gov/news.release/archives/ecec_12162021.htm .

(2) Selected "Total compensation, Cost (\$)" values from the table referenced in footnote 1.

(3) Loaded wage is the total compensation cost increased by 110 percent to account for the benefit packages available to those employed by private industry.

EPA Wages (\$2022)		
Category (1)	Hourly Mean Wage (2)	Wage With Fringe & Overhead (3)
(GS- 12, step 1) - Technical	\$32.73	\$52.37
(GS- 13, step 5) - Managerial	\$44.10	\$70.56
(GS-6, step 3) - Clerical	\$17.17	\$27.48

Footnotes:

(1) The hourly mean wage for each category is based on 2021 wages, and is found here: <https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/21Tables/html/GS>

(2) This value represents the Hourly Basic Rate.

(3) Wage with fringe and overhead is the hourly mean wage increased by 60 percent to account for the benefit packages available to government employees.

Table 1 : Annual Respondent Burden and Cost Year One – Surface Coating of Plastic Parts for Business Machines NSPS Review (40 CFR Part 60, Subparts TTT and TTTa) (Amendments)

Burden item	(A) Respondent hours per occurrence (technical hours)	(B) Non-Labor Costs per Occurrence	(C) No. of occurrences per respondent per Year	(D) Hours per respondent per year (D=AxC)	(E) Number of Respondents per Year ^a	(F) Total Number of Responses per Year (F=CxE)	(G) Technical hours per year (G=DxE)	(H) Management hours per year (H=Gx0.05)	(I) Clerical hours per year (I=Gx0.1)	(J) Total Labor Hours per Year (J=G+H+I)	(K) Total Non-Labor Costs per Year (K=BxCxE)	(L) Total Labor Cost per Year, \$ ^b
A. Reporting Requirements												
1. Familiarization with regulatory requirements ^c	0.87		1	0.87	0	0	0.00	0.00	0.00	0	\$0	\$0
2. Required activities:												
Initial performance tests ^d	2.61		1	2.61	0	0	0	0	0	0	\$0	\$0
Demonstration of CMS	N/A											
Repeat of performance tests ^e	2.61		0.2	0.522	0	0	0	0	0	0	\$0	\$0
Method 24 testing ^{f, g}	78.26		4	313.04	0	0	0.00	0.00	0.00	0	\$0	\$0
3. Create information	See A.2											
4. Gather existing information	See A.5											
5. Write report:												
Notification of construction/reconstruction ^h	1.74		1	1.74	0	0	0	0	0	0	\$0	\$0
Notification of actual startup ^h	1.74		1	1.74	0	0	0	0	0	0	\$0	\$0
Notification of initial performance test ^h	1.74		1	1.74	0	0	0	0	0	0	\$0	\$0
Report of performance test	5.22		1	5.22	0	0	0	0	0	0	\$0	\$0
Quarterly report of noncompliance ⁱ	13.91		4	55.64	0.00	0.00	0.00	0.00	0.00	0	\$0	\$0
Semiannual report of compliance ^j	0.43		2	0.86	0	0	0.00	0.00	0.00	0	\$0	\$0
Subtotal for Reporting Requirements						0.00	0.00	0.00	0.00	0	\$0	\$0
B. Recordkeeping Requirements												
1. Read instructions	See A.1											
2. Plan activities	See A.2											
3. Implement activities	See A.2											
4. Develop record system	0.87		1	0.87	0	0	0	0	0	0	\$0	\$0
5. Time to enter information:												
Record of monthly performance tests ^k	6.09		12	73.08	0	0	0.00	0	0	0	\$0	\$0
6. Train personnel	N/A											
7. Audits	N/A											
8. Familiarization with CDX and CEDRI system ^l	2		1	2	3	3	6	0.3	0.6	6.9	\$0	\$828
Subtotal for Recordkeeping Requirements						3.00	6.00	0.30	0.60	7	\$0	\$828
TOTAL LABOR BURDEN AND COST						3	6.00	0.30	0.60	7		\$828
Capital and O&M Cost											\$0	
GRAND TOTAL (rounded) ^m											\$0	\$828

2021 ICR Wages	
Technical	\$123.95
Managerial	\$157.61
Clerical	\$62.52

Assumptions:

^a We have assumed that the average number of respondents that will be affected by the rule amendments will be 3 existing sources, to incorporate electronic reporting requirements. This is a decrease of 7 respondents (from 10 in the renewal ICR 1093.13). There will be no additional sources over the 3-year period of this ICR.

^b This ICR uses the following labor rates: Managerial \$157.61 (\$75.05 + 110%); Technical \$123.95 (\$59.02 + 110%); and Clerical \$62.52 (\$29.77 + 110%). These rates are from the United States Department of Labor, Bureau of Labor Statistics, September 2021, "Table 2. Civilian Workers, by occupational and industry group." The rates are from column 1, "Total compensation." The rates have been increased by 110 percent to account for varying industry wage rates and the additional overhead business costs of employing workers beyond their wages and benefits, including business expenses associated with hiring, training, and equipping their employees.

^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 used by the respondents and is generally done by the coating 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 due to modification.

^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 will exceed the emission standard at least once in each quarterly reporting period; therefore, an average of one facility will be required to write the quarterly excess emission report four times per year.

We have assumed that it will take 13.91 hours to write each quarterly report of noncompliance.

^j We have assumed that each respondent will take 0.43 two times per year to write the semiannual report of compliance.

^k Hours required to record monthly performance tests are 6.09.

^l We have assumed that it will take 2 hours for existing respondents to familiarize themselves with electronic reporting requirements, only in the first year following promulgation.

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

Table 2 : Annual Respondent Burden and Cost Year Two – Surface Coating of Plastic Parts for Business Machines NSPS Review (40 CFR Part 60, Subparts TTT and TTTa) (Amendments)

Burden item	(A) Respondent hours per occurrence (technical hours)	(B) Non-Labor Costs per Occurrence	(C) No. of occurrences per respondent per Year	(D) Hours per respondent per year (D=AxC)	(E) Number of Respondents per Year ^a	(F) Total Number of Responses per Year (F=CxE)	(G) Technical hours per year (G=DxE)	(H) Management hours per year (H=Gx0.05)	(I) Clerical hours per year (I=Gx0.1)	(J) Total Labor Hours per Year (J=G+H+I)	(K) Total Non-Labor Costs per Year (K=BxCxE)	(L) Total Labor Cost per Year, \$ ^b
A. Reporting Requirements												
1. Familiarization with regulatory requirements ^c	0.87		1	0.87	0	0	0.00	0.00	0.00	0	\$0	\$0
2. Required activities:												
Initial performance tests ^d	2.61		1	2.61	0	0	0	0	0	0	\$0	\$0
Demonstration of CMS	N/A											
Repeat of performance tests ^e	2.61		0.2	0.522	0	0	0	0	0	0	\$0	\$0
Method 24 testing ^{f, g}	78.26		4	313.04	0	0	0.00	0.00	0.00	0	\$0	\$0
3. Create information	See A.2											
4. Gather existing information	See A.5											
5. Write report:												
Notification of construction/reconstruction ^h	1.74		1	1.74	0	0	0	0	0	0	\$0	\$0
Notification of actual startup ^h	1.74		1	1.74	0	0	0	0	0	0	\$0	\$0
Notification of initial performance test ^h	1.74		1	1.74	0	0	0	0	0	0	\$0	\$0
Report of performance test	5.22		1	5.22	0	0	0	0	0	0	\$0	\$0
Quarterly report of noncompliance ⁱ	13.91		4	55.64	0.00	0.00	0.00	0.00	0.00	0	\$0	\$0
Semiannual report of compliance ^j	0.43		2	0.86	0	0	0.00	0.00	0.00	0	\$0	\$0
Subtotal for Reporting Requirements						0.00	0.00	0.00	0.00	0	\$0	\$0
B. Recordkeeping Requirements												
1. Read instructions	See A.1											
2. Plan activities	See A.2											
3. Implement activities	See A.2											
4. Develop record system	0.87		1	0.87	0	0	0	0	0	0	\$0	\$0
5. Time to enter information:												
Record of monthly performance tests ^k	6.09		12	73.08	0	0	0.00	0	0	0	\$0	\$0
6. Train personnel	N/A											
7. Audits	N/A											
8. Familiarization with CDX and CEDRI system ^l	2		1	2	0	0	0	0	0	0	\$0	\$0
Subtotal for Recordkeeping Requirements						0.00	0.00	0.00	0.00	0	\$0	\$0
TOTAL LABOR BURDEN AND COST						0	0.00	0.00	0.00	0		\$0
Capital and O&M Cost											\$0	
GRAND TOTAL (rounded) ^m											\$0	\$0

2021 ICR Wages	
Technical	\$123.95
Managerial	\$157.61
Clerical	\$62.52

Assumptions:

^a We have assumed that the average number of respondents that will be affected by the rule amendments will be 3 existing sources, to incorporate electronic reporting requirements. This is a decrease of 7 respondents (from 10 in the renewal ICR 1093.13). There will be no additional sources over the 3-year period of this ICR.

^b This ICR uses the following labor rates: Managerial \$157.61 (\$75.05 + 110%); Technical \$123.94 (\$59.02 + 110%); and Clerical \$62.52 (\$29.77 + 110%). These rates are from the United States Department of Labor, Bureau of Labor Statistics, September 2021, "Table 2. Civilian Workers, by occupational and industry group." The rates have been increased by 110 percent to account for varying industry wage rates and the additional overhead business costs of employing workers beyond their wages and benefits, including business expenses associated with hiring, training, and equipping their employees.

^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 used by the respondents and is generally done by the coating 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 due to modification.

^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 will exceed the emission standard at least once in each quarterly reporting period; therefore, an average of one facility will be required to write the quarterly excess emission report four times per year.

We have assumed that it will take 13.91 hours to write each quarterly report of noncompliance.

^j We have assumed that each respondent will take 0.43 two times per year to write the semiannual report of compliance.

^k Hours required to record monthly performance tests are 6.09.

^l We have assumed that it will take 2 hours for existing respondents to familiarize themselves with electronic reporting requirements, only in the first year following promulgation.

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

Table 3 : Annual Respondent Burden and Cost Year Three – Surface Coating of Plastic Parts for Business Machines NSPS Review (40 CFR Part 60, Subparts TTT and TTTa) (Amendments)

Burden item	(A) Respondent hours per occurrence (technical hours)	(B) Non-Labor Costs per Occurrence	(C) No. of occurrences per respondent per Year	(D) Hours per respondent per year (D=AxC)	(E) Number of Respondents per Year ^a	(F) Total Number of Responses per Year (F=CxE)	(G) Technical hours per year (G=DxE)	(H) Management hours per year (H=Gx0.05)	(I) Clerical hours per year (I=Gx0.1)	(J) Total Labor Hours per Year (J=G+H+I)	(K) Total Non-Labor Costs per Year (K=BxCxE)	(L) Total Labor Cost per Year, \$ ^b
A. Reporting Requirements												
1. Familiarization with regulatory requirements ^c	0.87		1	0.87	0	0	0.00	0.00	0.00	0	\$0	\$0
2. Required activities:												
Initial performance tests ^d	2.61		1	2.61	0	0	0	0	0	0	\$0	\$0
Demonstration of CMS	N/A											
Repeat of performance tests ^e	2.61		0.2	0.522	0	0	0	0	0	0	\$0	\$0
Method 24 testing ^{f, g}	78.26		4	313.04	0	0	0.00	0.00	0.00	0	\$0	\$0
3. Create information	See A.2											
4. Gather existing information	See A.5											
5. Write report:												
Notification of construction/reconstruction ^h	1.74		1	1.74	0	0	0	0	0	0	\$0	\$0
Notification of actual startup ^h	1.74		1	1.74	0	0	0	0	0	0	\$0	\$0
Notification of initial performance test ^h	1.74		1	1.74	0	0	0	0	0	0	\$0	\$0
Report of performance test	5.22		1	5.22	0	0	0	0	0	0	\$0	\$0
Quarterly report of noncompliance ⁱ	13.91		4	55.64	0.00	0.00	0.00	0.00	0.00	0	\$0	\$0
Semiannual report of compliance ^j	0.43		2	0.86	0	0	0.00	0.00	0.00	0	\$0	\$0
Subtotal for Reporting Requirements						0.00	0.00	0.00	0.00	0	\$0	\$0
B. Recordkeeping Requirements												
1. Read instructions	See A.1											
2. Plan activities	See A.2											
3. Implement activities	See A.2											
4. Develop record system	0.87		1	0.87	0	0	0	0	0	0	\$0	\$0
5. Time to enter information:												
Record of monthly performance tests ^k	6.09		12	73.08	0	0	0.00	0	0	0	\$0	\$0
6. Train personnel	N/A											
7. Audits	N/A											
8. Familiarization with CDX and CEDRI system ^l	2		1	2	0	0	0	0	0	0	\$0	\$0
Subtotal for Recordkeeping Requirements						0.00	0.00	0.00	0.00	0	\$0	\$0
TOTAL LABOR BURDEN AND COST						0	0.00	0.00	0.00	0		\$0
Capital and O&M Cost											\$0	
GRAND TOTAL (rounded) ^m											\$0	\$0

2021 ICR Wages	
Technical	\$123.95
Managerial	\$157.61
Clerical	\$62.52

Assumptions:

^a We have assumed that the average number of respondents that will be affected by the rule amendments will be 3 existing sources, to incorporate electronic reporting requirements. This is a decrease of 7 respondents (from 10 in the renewal ICR 1093.13). There will be no additional sources over the 3-year period of this ICR.

^b This ICR uses the following labor rates: Managerial \$157.61 (\$75.05 + 110%); Technical \$123.94 (\$59.02 + 110%); and Clerical \$62.52 (\$29.77 + 110%). These rates are from the United States Department of Labor, Bureau of Labor Statistics, September 2021, "Table 2. Civilian Workers, by occupational and industry group." The rates have been increased by 110 percent to account for varying industry wage rates and the additional overhead business costs of employing workers beyond their wages and benefits, including business expenses associated with hiring, training, and equipping their employees.

^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 used by the respondents and is generally done by the coating 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 due to modification.

^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 will exceed the emission standard at least once in each quarterly reporting period; therefore, an average of one facility will be required to write the quarterly excess emission report four times per year.

We have assumed that it will take 13.91 hours to write each quarterly report of noncompliance.

^j We have assumed that each respondent will take 0.43 two times per year to write the semiannual report of compliance.

^k Hours required to record monthly performance tests are 6.09.

^l We have assumed that it will take 2 hours for existing respondents to familiarize themselves with electronic reporting requirements, only in the first year following promulgation.

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

Table 4 - Summary of Annual Respondent Burden and Cost of Recordkeeping and Reporting Requirements for the Surface Coating of Plastic Parts for Business Machines NSPS Review (40 CFR Part 60, Subparts TTT and TTTa) (Amendments)

Year	Technical Hours	Management Hours	Clerical Hours	Total Labor Hours	Labor Cost	Non-Labor (Capital/Startup and O&M) Cost	Total Cost ^a
1	6	0	1	7	\$828	\$0	\$828
2	0	0	0	0	\$0	\$0	\$0
3	0	0	0	0	\$0	\$0	\$0
Total ^a	6.0	0.3	0.6	6.9	\$828	\$0	\$828
Average ^b	2.0	0.1	0.2	2.3	\$276	\$0	\$276
Year	Number of Respondents	Number of Responses	Reporting Hours	Recordkeeping Hours	Total Hours	Hours per Response	Hours per Respondent-Response
1	3	3	0	7	7	2	1
2	3	0	0	0	0	0	0
3	3	0	0	0	0	0	0
Total	9.0	3.0	0.0	6.9	6.9	2.3	0.8
Average	3.0	1.0	0.0	2.3	2.3	0.8	0.3

Notes:

- a Total costs have been rounded to 3 significant figures. Figures may not add exactly due to rounding.
- b Average costs have been rounded to 3 significant figures.

Table 5: Average Annual EPA Burden and Cost Year One – Surface Coating of Plastic Parts for Business Machines NSPS Review (40 CFR Part 60, Subparts TTT and TTTa) (Amendments)

Activity	(A) EPA hours per occurrence (technical hours)	(B) Number of occurrences per plant per year	(C) EPA hours per year (C=AxB)	(D) Plants per year ^a	(E) Technical hours per year (E=CxD)	(F) Managerial hours per year (E x 0.05)	(G) Clerical hours per year (E x 0.1)	(H) Total cost per year ^b
Observe initial performance tests ^c	2.61	1	2.61	0	0	0	0	\$0
Observe repeat of initial performance tests ^d	2.61	0.2	0.52	0	0	0	0	\$0
Review reports:								
Notification of construction ^e	1.74	1	1.74	0	0	0	0	\$0
Notification of initial startup ^e	1.74	1	1.74	0	0	0	0	\$0
Notification of actual startup ^e	1.74	1	1.74	0	0	0	0	\$0
Notification of initial test ^e	1.74	1	1.74	0	0	0	0	\$0
Review test results ^e	1.74	1	1.74	0	0.000	0.000	0.000	\$0
Quarterly reports of noncompliance ^f	6.96	4	27.83	0	0.00	0.00	0.00	\$0
Semiannual reports of compliance ^g	0.44	2	0.87	0	0.00	0.00	0.00	\$0
TOTAL LABOR BURDEN AND COST (rounded) ^f					0	0	0	\$ -

2021 ICR Wages	
Technical	\$52.37
Managerial	\$70.56
Clerical	\$27.48

Assumptions:

^a We have assumed that the average number of respondents that will be affected by the rule amendments will be 3 existing sources, to incorporate electronic reporting requirements, with no change in burden to EPA. There will be no additional sources over the 3-year period of this ICR.

^b This cost is based on the following labor rates, which incorporate a 1.6 benefits multiplication factor to account for government overhead expenses: \$51.24 Technical rate, \$69.04 Managerial rate, and \$27.73 Clerical rate. These rates are from the Office of Personnel Management (OPM) “2022 General Schedule,” which excludes locality rates of pay.

^c We have assumed that it will take 2.61 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 Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding

Table 6: Average Annual EPA Burden and Cost Year Two – Surface Coating of Plastic Parts for Business Machines NSPS Review (40 CFR Part 60, Subparts TTT and TTTa) (Amendments)

Activity	(A) EPA hours per occurrence (technical hours)	(B) Number of occurrences per plant per year	(C) EPA hours per year (C=AxB)	(D) Plants per year ^a	(E) Technical hours per year (E=CxD)	(F) Managerial hours per year (E x 0.05)	(G) Clerical hours per year (E x 0.1)	(H) Total cost per year ^b
Observe initial performance tests ^c	2.61	1	2.61	0	0	0	0	\$0
Observe repeat of initial performance tests ^d	2.61	0.2	0.52	0	0	0	0	\$0
Review reports:								
Notification of construction ^e	1.74	1	1.74	0	0	0	0	\$0
Notification of initial startup ^e	1.74	1	1.74	0	0	0	0	\$0
Notification of actual startup ^e	1.74	1	1.74	0	0	0	0	\$0
Notification of initial test ^e	1.74	1	1.74	0	0	0	0	\$0
Review test results ^e	1.74	1	1.74	0	0.000	0.000	0.000	\$0
Quarterly reports of noncompliance ^f	6.96	4	27.83	0	0.00	0.00	0.00	\$0
Semiannual reports of compliance ^g	0.44	2	0.87	0	0.00	0.00	0.00	\$0
TOTAL LABOR BURDEN AND COST (rounded) ^f					0	0	0	\$ -

2021 ICR Wages	
Technical	\$52.37
Managerial	\$70.56
Clerical	\$27.48

Assumptions:

^a We have assumed that the average number of respondents that will be affected by the rule amendments will be 3 existing sources, to incorporate electronic reporting requirements, with no change in burden to EPA. There will be no additional sources over the 3-year period of this ICR.

^b This cost is based on the following labor rates, which incorporate a 1.6 benefits multiplication factor to account for government overhead expenses: \$51.24 Technical rate, \$69.04 Managerial rate, and \$27.73 Clerical rate. These rates are from the Office of Personnel Management (OPM) “2022 General Schedule,” which excludes locality rates of pay.

^c We have assumed that it will take 2.61 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 Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding

Table 7: Average Annual EPA Burden and Cost Year Three – Surface Coating of Plastic Parts for Business Machines NSPS Review (40 CFR Part 60, Subparts TTT and TTTa) (Amendments)

Activity	(A) EPA hours per occurrence (technical hours)	(B) Number of occurrences per plant per year	(C) EPA hours per year (C=AxB)	(D) Plants per year ^a	(E) Technical hours per year (E=CxD)	(F) Managerial hours per year (E x 0.05)	(G) Clerical hours per year (E x 0.1)	(H) Total cost per year ^b
Observe initial performance tests ^c	2.61	1	2.61	0	0	0	0	\$0
Observe repeat of initial performance tests ^d	2.61	0.2	0.52	0	0	0	0	\$0
Review reports:								
Notification of construction ^e	1.74	1	1.74	0	0	0	0	\$0
Notification of initial startup ^e	1.74	1	1.74	0	0	0	0	\$0
Notification of actual startup ^e	1.74	1	1.74	0	0	0	0	\$0
Notification of initial test ^e	1.74	1	1.74	0	0	0	0	\$0
Review test results ^e	1.74	1	1.74	0	0.000	0.000	0.000	\$0
Quarterly reports of noncompliance ^f	6.96	4	27.83	0	0.00	0.00	0.00	\$0
Semiannual reports of compliance ^g	0.44	2	0.87	0	0.00	0.00	0.00	\$0
TOTAL LABOR BURDEN AND COST (rounded)^f					0	0	0	\$ -

2021 ICR Wages	
Technical	\$52.37
Managerial	\$70.56
Clerical	\$27.48

Assumptions:

^a We have assumed that the average number of respondents that will be affected by the rule amendments will be 3 existing sources, to incorporate electronic reporting requirements, with no change in burden to EPA. There will be no additional sources over the 3-year period of this ICR.

^b This cost is based on the following labor rates, which incorporate a 1.6 benefits multiplication factor to account for government overhead expenses: \$51.24 Technical rate, \$69.04 Managerial rate, and \$27.73 Clerical rate. These rates are from the Office of Personnel Management (OPM) “2022 General Schedule,” which excludes locality rates of pay.

^c We have assumed that it will take 2.61 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 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 of Recordkeeping and Reporting Requirements for the Surface Coating of Plastic Parts for Business Machines NSPS Review (40 CFR Part 60, Subparts TTT and TTTa) (Amendments)

Year	Technical Hours	Management Hours	Clerical Hours	Total Hours	Labor Cost	Non-Labor Costs	Total Cost
1	0	0	0	0	\$0	\$0	\$0
2	0	0	0	0	\$0	\$0	\$0
3	0	0	0	0	\$0	\$0	\$0
Total ^a	0	0	0	0	\$0	\$0	\$0
Average ^b	0	0	0	0	\$0	\$0	\$0

Notes:

a Total costs have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

b Average costs have been rounded to 3 significant figures.