

### ICR Summary Information

Hours per Response	39
Number of Respondents	158
Total Estimated Burden Hours	16,200
Total Estimated Costs	\$2,200,000
Annualized Capital O&M	\$151,000
Total Annual Responses	411
Form Number	Not Applicable

**Table 1: Annual Respondent Burden and Cost – NSPS for Metal Coil Surface Coating (40 CFR Part**

<b>Burden item</b>	<b>(A) Person-hours per occurrence</b>	<b>(B) Annual occurrences per respondent</b>	<b>(C) Person-hours per respondent per year (AxB)</b>
1. Applications	N/A		
2. Surveys and studies	N/A		
3. Reporting requirements			
A. Familiarization with regulatory requirements <sup>a</sup>	1	1	1
B. Required activities			
Initial performance test <sup>c</sup>	30	0.07	2
Repeat performance test <sup>c</sup>	30	0.07	2
C. Gather existing information	See 3B		
D. Write report			
Notification of construction/reconstruction <sup>c</sup>	2	1	2
Notification of actual startup <sup>c</sup>	2	1	2
Notification of CMS demonstration date	2	1	2
Report of performance test <sup>c</sup>	See 3B		
VOC emissions report <sup>d</sup>	5	2	10
Excess emissions report <sup>d</sup>	5	4	20
Temperature variance report <sup>e</sup>	4	0.5	2
<b>Subtotal for Reporting Requirements</b>			
4. Recordkeeping requirements			
A. Familiarization with regulatory requirements	See 3A		
B. Plan activities	See 3B		
C. Implement activities			
Monthly VOC weighted average calculations <sup>f</sup>	1	12	12
D. Develop record system			
Records of temperature <sup>e</sup>	0.25	365	91.25
Records of data used to support monthly VOC calculations <sup>f</sup>	0.25	12	3.0
<b>Subtotal for Recordkeeping Requirements</b>			
<b>TOTAL ANNUAL BURDEN AND COST (ROUNDED)<sup>g</sup></b>			
<b>Total CAPITAL and O&amp;M COST (rounded)<sup>g</sup></b>			
<b>GRAND TOTAL (rounded)<sup>g</sup></b>			

<sup>a</sup> On average, EPA estimates 158 existing sources will be subject to the NSPS. No new sources will become subject to the standard burden to re-familiarize themselves with the regulatory requirements each year.

<sup>b</sup> This ICR uses the following labor rates: \$163.17 (\$77.70 + 110%) per hour for Executive, Administrative, and Managerial labor and \$45.00 per hour for Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, September 2022 column 1, “Total compensation.” The rates have been increased by 110 percent to account for varying industry wage rates and benefits, including business expenses associated with hiring, training, and equipping their employees.

<sup>c</sup> This is a one-time requirement and does not apply since no new sources are estimated. EPA assumes 20% of new sources must

<sup>d</sup> EPA assumes 10% of respondents have excess VOC emissions and must report quarterly instead of semi-annually. The remainder

<sup>e</sup> EPA assumes 80% of facilities will use incineration, and will file a temperature variance report every other year. These facilities will report gas temperature (for therm incineration) or gas temperature (for catalytic incineration)

<sup>f</sup> EPA assumes the remaining 20% of sources do not have control devices will comply using the monthly weighted average VOC

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

Table 60, Subpart TT) (Renewal)

(D) Respondents per year <sup>a</sup>	(E) Technical hours per year (CxD)	(F) Management hours per year (Ex0.05)	(G) Clerical hours per year (Ex0.10)	(H) Annual cost (\$) <sup>b</sup>
158	158	8	16	22,911.50
0	0	0	0	0.00
0	0	0	0	0.00
0	0	0	0	0.00
0	0	0	0	0.00
0	0	0	0	0.00
142	1,420	71	142	205,913.49
16	320	16	32	46,403.04
126	252	12.6	25.2	36,542.39
		<b>2,473</b>		<b>311,770</b>
32	384	19.2	38.4	55,683.65
126	11,498	575	1,150	1,667,246.73
32	96	4.8	9.6	13,920.91
		<b>13,774</b>		<b>1,736,851</b>
		<b>16,200</b>		<b>2,050,000</b>
				<b>151,000</b>
		<b>16,200</b>		<b>2,200,000</b>

Labor I
Management
Technical
Clerical

hrs/response

ward over the three-year period of this ICR. This ICR assumes each respondent will incur a  
 cost of \$130.28 (\$62.04 + 110%) per hour for Technical labor, and \$65.71 (\$31.29 + 110%) per  
 hour for Management labor. Table 2, "Table 2. Civilian workers by occupational and industry group." The rates are from  
 the additional overhead business costs of employing workers beyond their wages and

to repeat performance testing due to failure.  
 Reporting 90% of sources report semi-annually.  
 Sources will also have to maintain daily temperature records of incinerator combustion

∩ calculation approach.

Rates
\$163.17
\$130.28
\$65.71

**Table 2: Average Annual EPA Burden and Cost – NSPS for Metal Coil Surface Coating (40 CFR**

<b>Burden item</b>	<b>(A) EPA person-hours per occurrence</b>	<b>(B) Annual occurrences per respondent</b>	<b>(C) EPA person- hours per respondent per year (AxB)</b>
Initial performance test			
New plant <sup>c</sup>	24	0.07	2
Repeat performance test			
New plant <sup>c</sup>	24	1	24
Report review			
New plant <sup>c</sup>			
Notification of construction/reconstruction	2	1	2
Notification of actual startup	0.5	1	0.5
Notification of CMS demonstration date	0.5	1	0.5
Review test results	8	1	8
Existing plant			
VOC emissions report <sup>d</sup>	2	2	4
Excess emissions report <sup>d</sup>	2	4	8
Temperature variance report <sup>e</sup>	2	0.5	1
<b>TOTAL ANNUAL BURDEN AND COST (ROUNDED)<sup>f</sup></b>			

<sup>a</sup> On average, EPA estimates 158 existing sources will be subject to the NSPS. No new sources will become subject to the NSPS.

<sup>b</sup> The cost is based on the following labor rates: Managerial rate of \$73.456 (GS-13, Step 5, \$45.91 + 60%), Technical rate of \$45.91 (GS-11, Step 5, \$45.91 + 60%). These rates are from the Office of Personnel Management (OPM), 2023 General Schedule, which excludes locality, and are not available to government employees.

<sup>c</sup> This is a one-time requirement and does not apply since no new sources are expected.

<sup>d</sup> EPA assumes 10% of sources will have excess emissions and will file a quarterly report instead of the semi-annual frequency.

<sup>e</sup> EPA assumes 80% of facilities will use incineration, and will file a temperature variance report every other year.

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

**Part 60, Subpart TT) (Renewal)**

(D) Respondents per year <sup>a</sup>	(E) Technical hours per year (CxD)	(F) Management hours per year (Ex0.05)	(G) Clerical hours per year (Ex0.10)	(H) Annual cost (\$) <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
142	568	28.4	56.8	34,724
16	128	6.4	12.8	7,825
126	126	6.3	12.6	7,703
		<b>945</b>		<b>50,300</b>

Labor
Management
Technical
Clerical

standard over the three-year period of this ICR.

of \$54,512 (GS-12, Step 1, \$34,07 + 60%), and Clerical rate of \$29,504 (GS-6, Step 3, \$18,44 + rates of pay. The rates have been increased by 60 percent to account for the benefit packages

cy submitted from the other 90% of sources.

r Rates
\$73.46
\$54.51
\$29.50

<b>Capital/Startup vs. Operation and Maintenance</b>			
<b>(A)</b>	<b>(B)</b>	<b>(C)</b>	<b>(D)</b>
<b>Continuous Monitoring Device</b>	<b>Capital/Startup Cost for One Respondent</b>	<b>Number of New Respondents <sup>a</sup></b>	<b>Total Capital/Startup Cost, (B X C)</b>
Temperature Monitoring System	N/A	N/A	\$0
Method 25 Performance Test	\$18,750 <sup>b</sup>	0	\$0
<b>Total (Rounded)<sup>c</sup></b>			<b>\$0</b>

<sup>a</sup> According to industry consultation comment received on an ICR for a related rulemaking (40 CFR part 63 s measuring monitor is \$1,200 per respondent. The cost covers replacement of temperature sensor each calenda use an incinerator to comply with the requirements.

<sup>b</sup> Costs included to contract out for a one-time initial performance test using Method 25 or Method 25A for fa conducted an initial performance test.

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

**(O&M) Costs**

(E)	(F)	(G)
Annual O&M Costs for One Respondent	Number of Respondents with O&M <sup>b</sup>	Total O&M, (E X F)
\$1,200 <sup>a</sup>	126	\$151,200
N/A	N/A	\$0
		<b>\$151,000</b>

\$151,000

ubpart SSSS), the O&M cost to maintain continuous temperature  
r year. This cost is applied to the 80 percent of respondents assumed to  
ilities with control devices. It is assumed that all existing facilities have

<b>Total Annual Responses</b>				
(A) Information Collection Activity	(B) Number of Respondents	(C) Number of Responses	(D) Number of Existing Respondents That Keep Records But Do Not Submit Reports	(E) Total Annual Responses E=(BxC)+D
Notification of construction/reconstruction	0	1	0	0
Notification of actual startup	0	1	0	0
Notification of CMS demonstration date	0	1	0	0
Notification of performance test	0	1	0	0
VOC emissions report	142	2	0	284
Excess emissions report	16	4	0	64
Temperature variance report	126	0.5	0	63
			<b>Total</b>	<b>411</b>

<b>Number of Respondents</b>					
	Respondents That Submit Reports		Respondents That Do Not Submit Any Reports		
	(A)	(B)	(C)	(D)	(E)
Year	Number of New Respondents	Number of Existing Respondents	Number of Existing Respondents that keep records but do not submit reports	Number of Existing Respondents That Are Also New Respondents	Number of Respondents  (E=A+B+C-D)
1	0	158	0	0	158
2	0	158	0	0	158
3	0	158	0	0	158
Average	0	158	0	0	158

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