U.S. Environmental Protection Agency

Information Collection Request

**Title:** NESHAP for Aerospace Manufacturing and Rework Facilities (40 CFR Part 63, Subpart GG) (Renewal)

**OMB Control Number:** 2060-0314

**EPA ICR Number:** 1687.13

**Abstract:** The National Emission Standards for Hazardous Air Pollutants (NESHAP) for the regulations published at 40 CFR Part 63, Subpart GG were proposed on June 6, 1994; promulgated on September 1, 1995; and amended on both December 7, 2015, and August 3, 2016. These regulations apply to existing and new aerospace manufacturing and rework facilities where the total hazardous air pollutants (HAP) emitted are greater than or equal to 10 tons per year of any combination of HAP, or where the total HAP emitted are greater than or equal to 25 tons per year of any combination of HAP. New facilities include those that commenced construction or reconstruction after the date of proposal. Operations covered include: cleaning, primer and topcoat application, depainting, chemical milling maskant application, handling and storage of waste, and specialty coating operations. This information is being collected to assure compliance with 40 CFR Part 63, Subpart GG.

In general, all NESHAP standards require initial notifications, performance tests, and periodic reports by the owners/operators of the affected facilities. They are also required to maintain records of the occurrence and duration of any startup, shutdown, or malfunction in the operation of an affected facility or any period during which the monitoring system is inoperative. These notifications, reports, and records are essential in determining compliance, and are required of all affected facilities subject to NESHAP.

Any owner/operator subject to the provisions of this part shall maintain a file of these measurements and retain the file for at least five years following the date of such measurements, maintenance reports, and records. All reports required to be submitted electronically are submitted through the EPA's Central Data Exchange (CDX), using the Compliance and Emissions Data Reporting Interface (CEDRI), where the delegated state or local authority can review them. In the event that there is no such delegated authority, the EPA regional office can review them. All other reports are sent to the delegated state or local authority. In the event that there is no such delegated authority, the reports are sent directly to the EPA regional offices. The use of the term "Designated Administrator" throughout this document refers to the U.S. EPA or a delegated authority such as a state agency. The term "Administrator" alone refers to the U.S. EPA Administrator.

**Supporting Statement A**

1. **NEED AND AUTHORITY FOR THE COLLECTION**

*Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection.*

The EPA is charged under [Section 112 of the Clean Air Act](https://www.epa.gov/laws-regulations/summary-clean-air-act), as amended, to establish standards of performance for each category or subcategory of major sources and area sources of hazardous air pollutants. These standards are applicable to new or existing sources of hazardous air pollutants and shall require the maximum degree of emission reduction.] [For all CAA standards use...] In addition, [section 114(a)](https://www.epa.gov/laws-regulations/summary-clean-air-act) states that the Administrator may require any owner/operator subject to any requirement of this Act to:

(A) Establish and maintain such records; (B) make such reports; (C) install, use, and maintain such monitoring equipment, and use such audit procedures, or methods; (D) sample such emissions (in accordance with such procedures or methods, at such locations, at such intervals, during such periods, and in such manner as the Administrator shall prescribe); (E) keep records on control equipment parameters, production variables or other indirect data when direct monitoring of emissions is impractical; (F) submit compliance certifications in accordance with Section 114(a)(3); and (G) provide such other information as the Administrator may reasonably require.

In the Administrator's judgment, HAP emissions from aerospace manufacturing and rework facilities cause or contribute to air pollution that may reasonably be anticipated to endanger public health or welfare. Therefore, the NESHAP were promulgated for this source category at [40 CFR Part 63, Subpart GG](https://www.ecfr.gov/current/title-40/chapter-I/subchapter-C/part-63/subpart-GG).

1. **PRACTICAL UTILITY/USERS OF THE DATA**

*Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.*

The recordkeeping and reporting requirements in the standards ensure compliance with the applicable regulations which were promulgated in accordance with the Clean Air Act. The collected information is also used for targeting inspections and as evidence in legal proceedings.

Performance tests are required in order to determine an affected facility’s initial capability to comply with the emission standards. Continuous emission monitors are used to ensure compliance with the standards at all times. During the performance test a record of the operating parameters under which compliance was achieved may be recorded and used to determine compliance in place of a continuous emission monitor.

The notifications required in the standards are used to inform the Agency or delegated authority when a source becomes subject to the requirements of the regulations. The reviewing authority may then inspect the source to check if the pollution control devices are properly installed and operated, leaks are being detected and repaired, and the standard is being met. The performance test may also be observed.

The required semiannual reports are used to determine periods of excess emissions, identify problems at the facility, verify operation/maintenance procedures and for compliance determinations.

Additionally, the EPA is requiring electronic reporting for certain notifications or reports. The EPA is requiring that owners or operators of affected sources would submit electronic copies of initial notifications required in 40 CFR 63.9(b), notifications of changes in information required in 40 CFR 63.9(j) and performance test reports through the EPA's Central Data Exchange (CDX), using the Compliance and Emissions Data Reporting Interface (CEDRI).

1. **USE OF TECHNOLOGY**

*Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden.*

Some of the respondents are using monitoring equipment that automatically records parameter data. Although personnel at the affected facility must still evaluate the data, internal automation has significantly reduced the burden associated with monitoring and recordkeeping at a plant site.

The rule was amended to include electronic reporting provisions on December 7, 2015. Respondents are required to use the EPA’s Electronic Reporting Tool (ERT) to develop performance test reports and submit them through the EPA’s Compliance and Emissions Data Reporting Interface (CEDRI), which can be accessed through the EPA’s Central Data Exchange (CDX) (<https://cdx.epa.gov/>). The ERT is an application rather than a form, and the requirement to use the ERT is applicable to numerous subparts. The splash screen of the ERT contains a link to the Paperwork Reduction Act (PRA) requirements, such as the OMB Control Number, expiration date, and burden estimate for this and other subparts. For purposes of this ICR, it is assumed that there is no additional burden associated with the proposed requirement for respondents to submit the notifications and reports electronically.

CEDRI includes the Electronic Reporting Tool (ERT) software, which is used by facilities to generate electronic reports of performance tests. EPA is also requiring that 40 CFR Part 63, Subpart GG performance test reports be submitted through the EPA’s ERT.

All electronic collection in this information collection is submitted through EPA's CEDRI or ERT. Additional Paperwork Reduction Act requirements for CEDRI and ERT, including the burden statement and OMB control number, are available at: <https://www.epa.gov/electronic-reporting-air-emissions/paperwork-reduction-act-pra-cedri-and-ert>.

1. **EFFORTS TO IDENTIFY DUPLICATION**

*Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.*

For reports required to be submitted electronically, the information is sent through the EPA's CDX, using CEDRI, where the appropriate EPA regional office can review it, as well as state and local agencies that have been delegated authority. If a state or local agency has adopted under its own authority its own standards for reporting or data collection, adherence to those non-Federal requirements does not constitute duplication.

 For all other reports, if the subject standards have not been delegated, the information is sent directly to the appropriate EPA regional office. Otherwise, the information is sent directly to the delegated state or local agency. If a state or local agency has adopted its own standards to implement the Federal standards, a copy of the report submitted to the state or local agency can be sent to the Administrator in lieu of the report required by the Federal standards. Therefore, duplication does not exist.

1. **MINIMIZING BURDEN ON SMALL BUSINESSES AND SMALL ENTITIES**

*If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.*

There are no small entities (i.e., small businesses) affected by this regulation.

1. **CONSEQUENCES OF LESS FREQUENT COLLECTION**

*Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.*

Less frequent information collection would decrease the margin of assurance that facilities are continuing to meet the standards. Requirements for information gathering and recordkeeping are useful techniques to ensure that good operation and maintenance practices are applied and emission limitations are met. If the information required by these standards was collected less frequently, the proper operation and maintenance of control equipment and the possibility of detecting violations would be less likely.

1. **GENERAL GUIDELINES**

*Explain any special circumstances that require the collection to be conducted in a manner inconsistent with OMB guidelines.*

The information collection is consistent with the guidelines set forth in 5 CFR 1320(d)(2) of the Paperwork Reduction Act guidelines.

1. **PUBLIC COMMENT AND CONSULTATIONS**

**8a. Public Comment**

*If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the Agency's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the Agency in response to these comments. Specifically address comments received on cost and hour burden.*

An announcement of a public comment period for the renewal of this ICR was published in the *Federal Register* (88 FR 31748) on May 18, 2023. No comments were received on the burden published in the Federal Register for this renewal.

**8b. Consultations**

*Describe efforts to consult with persons outside the Agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported. Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years - even if the collection of information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.*

The Agency has consulted industry experts and internal data sources to project the number of affected facilities and industry growth over the next three years. The primary source of information as reported by industry, in compliance with the recordkeeping and reporting provisions in the standard, is the Integrated Compliance Information System (ICIS). ICIS is EPA’s database for the collection, maintenance, and retrieval of compliance data for industrial and government-owned facilities. The growth rate for the industry is based on our consultations with the Agency’s internal industry experts. Approximately 144 respondents will be subject to the standard over the three-year period covered by this ICR.

Industry trade associations and other interested parties were provided an opportunity to comment on the burden associated with the standard as it was being developed and the standard has been previously reviewed to determine the minimum information needed for compliance purposes. In developing this ICR, we contacted both the Aerospace Industries Association at 703-358-1000 and the Aerospace Manufacturing Technologies at (360) 435-1119. In this case, no comments were received.

It is our policy to respond after a thorough review of comments received since the last ICR renewal as well as those submitted in response to the first Federal Register notice. In this case, no comments were received.

Over the next three years, approximately 144 respondents per year will be subject to the standard, and no additional respondents per year will become subject to the standard. This estimate includes 108 private-owned facilities and 36 Federal government facilities. Each respondent may have one or more operations (e.g., cleaning, coating, depainting, or specialty coating operations) subject to these standards. Of the 144 existing sources currently covered by these standards, 144 facilities (36 Federal government-owned facilities and 108 privately-owned facilities) have cleaning and coating operations, 109 facilities (27 Federal government-owned facilities and 82 privately-owned facilities) have specialty coating operations, and 5 facilities (1 Federal government-owned facility and 4 privately-owned facilities) have depainting operations.

1. **PAYMENTS OR GIFTS TO RESPONDENTS**

*Explain any decisions to provide payments or gifts to respondents, other than remuneration of contractors or grantees.*

No payments or gifts are provided to respondents.

1. **ASSURANCE OF CONFIDENTIALITY**

*Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or Agency policy. If the collection requires a systems of records notice (SORN) or privacy impact assessment (PIA), those should be cited and described here.*

None of the information collection requirements of this ICR require the disclosure of confidential business information.

1. **JUSTIFICATION FOR SENSITIVE QUESTIONS**

*Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the Agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.*

Questions about sensitive issues that are normally considered private (e.g., religious beliefs, sexual attitudes, and behavior) will not be included in the information collections covered by this ICR.

1. **RESPONDENT BURDEN HOURS & LABOR COSTS**

*Provide estimates of the hour burden of the collection of information. The statement should:*

* *Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Generally, estimates should not include burden hours for customary and usual business practices.*
* *If this request for approval covers more than one form, provide separate hour burden estimates for each form and the aggregate the hour burdens.*
* *Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included as O&M costs under non-labor costs covered under question 13.*

**12a. Respondents/NAICS Codes**

The respondents to the recordkeeping and reporting requirements are aerospace manufacturing and rework facilities. The United States Standard Industrial Classification (SIC) codes for the respondents affected by the standards and the corresponding North American Industry Classification System (NAICS) codes for the respondents can be found in the table below.

|  |  |  |
| --- | --- | --- |
| **Standard (40 CFR Part 63, Subpart GG)** | **SIC Codes** | **NAICS Codes** |
| Aircraft Manufacturing | 3721, 3728 | 336411 |
| Aircraft Engine and Engine Parts Manufacturing  | 3724 | 336412 |
| Other Aircraft Parts and Auxiliary Equipment Manufacturing | 3728 | 336413 |
|  Fluid Power Valve and Hose Fitting Manufacturing  | 3728 | 332912 |
| Guided Missile and Space Vehicle Manufacturing  | 3761 | 336414 |
| Guided Missile and Space Vehicle Propulsion Unit andPropulsion Unit Parts Manufacturing  | 3764 | 336415 |
| Other Guided Missile and Space Vehicle Parts andAuxiliary Equipment Manufacturing | 3769 | 336419 |
| Other Airport Operations  | 4581 | 488119 |

**12b. Information Requested**

In this ICR, all the data that are recorded or reported is required by the NESHAP for Aerospace Manufacturing and Rework Facilities (40 CFR Part 63, Subpart GG).

A source must make the following reports:

| **Notifications** |
| --- |
| Notification of construction and modification  | §§63.743(a)(2-3), §63.753(a), §63.5(d) |
| Initial notification for existing sources | §63.9(b)(2), §63.753(a)(2) |
| Notification of performance test and results | §63.7(b), §63.7(g)(1), §63.9(e), §63.10(d)(2), §63.753(a), §63.753(f) |
| Notification of physical and operational changes | §63.5(b)(6), §63.743(a)(2) |
| Notification of production capacity | §63.9(b)(2), §63.753(a) |
| Notification of compliance status | §63.9(h), §63.753(a) |
| Waiver applications | §63.7(h)(3), §63.753(a) |

| **Reports** |
| --- |
| Semiannual report, including report of periods of noncompliance | §63.753(a)(5),§63.753(b), §63.753(c)(1), §§63.753(d)(1) and (3), §63.753(e) |
| Annual report | §63.753(c)(2), §63.753(d)(2) |
| Performance test reports (electronic submission) | §63.753(f) |

A source must keep the following records:

| **Recordkeeping** |
| --- |
| Records of daily and monthly inspections | §63.10(b)(2), §63.743(a)(3), §63.752(a) |
| Records of failure to meet an emission standard, and corrective actions taken | §§63.752(a)(1)-(3) |
| Emission testing | §63.10(b)(2), §63.752(a) |
| Facility operation and maintenance including construction and modification | §63.5(b), §§63.743(a)(2)-(3) |
| Cleaning solvents, all information records | §63.752(b)(1) |
| Cleaning solvents, approved composition and vapor pressure, solvent usage records | §63.752(b)(2) |
| Cleaning solvents, non-approved composition, approved vapor pressure, solvent usage records | §63.752(b)(3) |
| Cleaning solvents, usage log for exempt processes | §63.752(b)(4) |
| Cleaning solvents, log of spray gun cleaner leaks | §63.752(b)(5) |
| Primers/topcoats/maskants/specialty coatings: Records using compliant coatings without averaging | §§63.752(c)(1-3), §63.752(f)(1) |
| Primers/topcoats/maskants/specialty coatings: Records using averaging | §63.752(c)(1), §63.752(c)(4), §63.752(f)(2) |
| Primers/topcoats/maskants/specialty coatings: Records using control devices | §63.752(c)(1), §§63.752(c)(5-6), §63.752(d), §§63.752(f)(3)-(4)  |
| Chemical strippers, records and parts removed | §63.752(e)(1), §63.752(e)(4) |
| Chemical strippers, records using control devices | §63.752(e)(2), §63.752(e)(3) |
| Depainting equipment malfunction log | §63.752(e)(5) |
| Annual exempt chemical stripper usage log and reworked airplane log for spot stripping and decal removal | §63.752(e)(6) |
| Depainting control device maintenance log | §63.752(e)(7) |
| 5-years retention of records | §63.10(b)(1), §63.752(a) |

There are approximately **144 total facilities**, including **36 facilities that are owned by the Federal government** and operated by federal contractors, while another **108 facilities are privately-owned**, for-profit businesses that are owned and operated by the Aerospace Manufacturing and Rework industry. We assume that they will all respond. The burden to the “Affected Public” may be found in Tables 1a through 1e: Annual Respondent Burden and Cost – NESHAP for Aerospace Manufacturing and Rework Facilities (40 CFR Part 63, Subpart GG) (Renewal). The burden to facilities owned by the Federal government is attributed entirely to work performed by government contractors and may be found in Tables 2a through 2e: Annual Burden and Cost for Federal Government-Owned Facilities – NESHAP for Aerospace Manufacturing and Rework Facilities (40 CFR Part 63, Subpart GG) (Renewal). The “burden” to the Federal Government is attributed entirely to work performed by Federal employees and may be found at the end of this document in Table 3: Average Annual EPA Burden and Cost – NESHAP for Aerospace Manufacturing and Rework Facilities (40 CFR Part 63, Subpart GG) (Renewal).

**12c. Respondent Activities**

The specific frequency for each information collection activity within this request is shown at the end of this document in Table 1: Annual Respondent Burden and Cost – NESHAP for Aerospace Manufacturing and Rework Facilities (40 CFR Part 63, Subpart GG) (Renewal).

| **Respondent Activities** |
| --- |
| Familiarization with the regulatory requirements. |
| Install, calibrate, maintain, and operate CMS for opacity, or for pressure drop and liquid supply pressure for control device.  |
| Perform initial performance test, Reference Method 1 or 1A, 2, 2B, 2C, or 2D, 3, 4, 18, 24, 25A, 40, 301, 311, or 319 tests, and repeat performance tests if necessary. |
| Write the notifications and reports listed above. |
| Enter information required to be recorded above. |
| Submit the required reports developing, acquiring, installing, and utilizing technology and systems for collecting, validating, and verifying information. |
| Develop, acquire, install, and utilize technology and systems for processing and maintaining information. |
| Develop, acquire, install, and utilize technology and systems for disclosing and providing information. |
| Train personnel to be able to respond to a collection of information. |
| Transmit, or otherwise disclose the information. |

**12d. Respondent Burden Hours and Labor Costs**

The average annual burden to industry over the next three years from these recordkeeping and reporting requirements is estimated to be 115,000 hours for privately-owned facilities (Total Labor Hours from Tables 1a through 1d, and summarized in Table 1e, at the end of this document). For government-owned facilities, the average annual burden is estimated to be 39,200 hours (Total Labor Hours from Tables 2a through 2d, and summarized in Table 2e, at the end of this document). This estimate is based on Agency knowledge and experience with the NESHAP program, the previously approved ICR, and any comments received.

For private facilities, this ICR uses the following labor rates:

* Managerial $163.17 ($77.70 + 110%)
* Technical $130.28 ($62.04 + 110%)
* Clerical $65.71 ($31.29 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, September 2022, “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.

For Federal facilities, this ICR uses the following labor rates:

* Managerial $73.46 (GS-13, Step 5, $45.91 + 60%)
* Technical $54.51 (GS-12, Step 1, $34.07 + 60%)
* Clerical $29.50 (GS-6, Step 3, $18.44 + 60%)

These rates are from the Office of Personnel Management (OPM), 2023 General Schedule, which excludes locality rates of pay. The rates have been increased by 60 percent to account for the benefit packages available to government employees. Details upon which this estimate is based appear at the end of this document in Tables 2a through 2d: Annual Burden and Cost for Federal Government-Owned Facilities – NESHAP for Aerospace Manufacturing and Rework Facilities (40 CFR Part 63, Subpart GG) (Renewal).

Respondent Tally

The **total annual labor hours are 115,000 hours for privately-owned facilities**. Details regarding these estimates may be found at the end of this document in Tables 1a through 1d: Annual Respondent Burden and Cost –NESHAP for Aerospace Manufacturing and Rework Facilities (40 CFR Part 63, Subpart GG) (Renewal). A summary of the total respondent labor hours can be found at the end of this document in Table 1e: Summary of Annual Respondent Burden and Cost for Tables 1a, 1b, 1c, & 1d – NESHAP for Aerospace Manufacturing and Rework Facilities (40 CFR Part 63, Subpart GG) (Renewal).

The **total annual labor hours are 39,200 for Federal government-owned facilities**. Details regarding these estimates may be found at the end of this document in Tables 2a through 2d: Annual Burden and Cost for Federal Government-Owned Facilities – NESHAP for Aerospace Manufacturing and Rework Facilities (40 CFR Part 63, Subpart GG) (Renewal). A summary of the total respondent labor hours can be found in Table 2e: Summary of Annual Respondent Burden and Cost for Tables 2a, 2b, 2c, & 2d – NESHAP for Aerospace Manufacturing and Rework Facilities (40 CFR Part 63, Subpart GG) (Renewal).

We assume that burdens for managerial tasks take 5% of the time required for technical tasks because the typical tasks for managers are to review and approve reports. Clerical burdens are assumed to take 10% of the time required for technical tasks because the typical duties of clerical staff are to proofread the reports, make copies and maintain records.

Furthermore, the annual public reporting and recordkeeping burden for this collection of information is estimated to average **191 hours per response for privately-owned facilities** and **193 hours per response for Federal government-owned facilities**.

1. **Respondent CAPITAL AND O&m CostS**

*Provide an estimate for the total annual cost burden to respondents or record keepers resulting from the collection of information. (Do not include the cost of any hour burden already reflected on the burden worksheet).*

*The cost estimate should be split into two components: (a) a total capital and start-up cost*

*component (annualized over its expected useful life) and (b) a total operation and maintenance and purchase of services component. The estimates should consider costs associated with generating, maintaining, and disclosing or providing the information. Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling, and testing equipment; and record storage facilities.*

*If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of purchasing or contracting out information collections services should be a part of this cost burden estimate.*

*Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government, or (4) as part of customary and usual business or private practices.*

The type of industry costs associated with the information collection activities in the subject standards are both labor costs which are addressed elsewhere in this ICR and the costs associated with continuous monitoring. The capital/startup costs are one-time costs when a facility becomes subject to the regulation. The annual operation and maintenance costs are the ongoing costs to maintain the monitors and other costs such as photocopying and postage.

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| --- |
| **Capital/Startup vs. Operation and Maintenance (O&M) Costs** |
| (A)Continuous Monitoring Device | (B)Capital/Startup Cost for One Respondent | (C)Number of New Respondents  | (D)Total Capital/Startup Cost, (B X C) | (E)Annual O&M Costs for One Respondent | (F)Number of Respondents with O&M | (G)Total O&M,(E X F) |
| **Privately-Owned Facilities** |
| CEM | $21,743  | 0 | $0  | $1,553  | 108 | $167,735  |
| Total |   |   | $0  |   |   | $168,000  |
| **Federal Government-Owned Facilities** |
| CEM | $21,743  | 0 | $0  | $1,553  | 36 | $55,912  |
| Total |   |   | $0  |   |   | $55,900  |

a Costs have been increased from 2007 to 2022 $ using the CEPCI Equipment Cost Index.

b Totals have been rounded to 3 significant digits. Figures may not add exactly due to rounding.

The total capital/startup costs for this ICR are $0. This is the total of column D in the above table.

The total operation and maintenance (O&M) costs for privately-owned facilities in this ICR are $168,000. The total operation and maintenance (O&M) costs for Federal government-owned facilities in this ICR are $55,900. These totals are in column G.

The average annual cost for capital/startup and operation and maintenance costs to industry over the next three years of the ICR is estimated to be **$168,000 for privately-owned facilities** and **$55,900 for Federal government-owned facilities**. These are **recordkeeping costs**.

1. **AGENCY** **COSTS**

*Provide estimates of annualized costs to the Federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information.*

**14a. Agency Activities**

EPA conducts the following activities in connection with the acquisition, analysis, storage, and distribution of the required information.

|  |
| --- |
| **Agency Activities** |
| Review notifications and reports, including performance test reports, and excess emissions reports, required to be submitted by industry. |
| Audit facility records. |
| Input, analyze, and maintain data in the Enforcement and Compliance History Online (ECHO) and ICIS. |

Following notification of startup, the reviewing authority could inspect the source to determine whether the pollution control devices are properly installed and operated. Performance test reports are used by the Agency to discern a source’s initial capability to comply with the emission standard and note the operating conditions under which compliance was achieved. Data and records maintained by the respondents are tabulated and published for use in compliance and enforcement programs. The semiannual reports are used for problem identification, as a check on source operation and maintenance, and for compliance determinations.

Information contained in the reports is reported by state and local governments in the ICIS Air database, which is operated and maintained by EPA's Office of Compliance. EPA uses ICIS for tracking air pollution compliance and enforcement by local and state regulatory agencies, EPA regional offices and EPA headquarters. EPA and its delegated Authorities can edit, store, retrieve and analyze the data.

 The records required by this regulation must be retained by the owner/operator for five years.

**14b. Agency Costs**

The only costs to the Agency are those costs associated with analysis of the reported information. EPA's overall compliance and enforcement program includes activities such as the examination of records maintained by the respondents, periodic inspection of sources of emissions, and the publication and distribution of collected information.

The average annual Agency cost during the three years of the ICR is estimated to be **$232,000**.

This cost is based on the average hourly labor rate as follows:

* Managerial $73.46 (GS-13, Step 5, $45.91 + 60%)
* Technical $54.51 (GS-12, Step 1, $34.07 + 60%)
* Clerical $29.50 (GS-6, Step 3, $18.44 + 60%)

These rates are from the Office of Personnel Management (OPM), 2023 General Schedule, which excludes locality rates of pay. The rates have been increased by 60 percent to account for the benefit packages available to government employees. Details upon which this estimate is based appear at the end of this document in Table 3: Average Annual EPA Burden and Cost – NESHAP for Aerospace Manufacturing and Rework Facilities (40 CFR Part 63, Subpart GG) (Renewal).

The average annual Agency burden and cost over next three years is estimated to be 4,360 labor hours at a cost of $232,000; see Table 3 at the end of this document: Average Annual EPA Burden and Cost – NESHAP for Aerospace Manufacturing and Rework Facilities (40 CFR Part 63, Subpart GG) (Renewal).

We assume that burdens for managerial tasks take 5% of the time required for technical tasks because the typical tasks for managers are to review and approve reports. Clerical burdens are assumed to take 10% of the time required for technical tasks because the typical duties of clerical staff are to proofread the reports, make copies and maintain records.

1. **REASONS FOR CHANGE IN BURDEN**

*Explain the reasons for any program changes or adjustments reported in the burden or capital/O&M cost estimates.*

There is no change in burden from the most recently approved ICR as currently identified in the OMB Inventory of Approved Burdens. This is due to two considerations. First, the regulations have not changed over the past three years and are not anticipated to change over the next three years. Second, the growth rate for this industry is very low or non-existent, so there is no significant change in the overall burden. There is a slight increase in costs, which is wholly due to the use of updated labor rates. This ICR uses labor rates from the most recent Bureau of Labor Statistics report (September 2022) to calculate respondent burden costs. There is an increase in capital and operation & maintenance costs due to an adjustment to increase from 2007 to 2022 $ using the CEPCI Equipment Cost Index.

1. **PUBLICATION OF** **DATA**

*For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.*

Results from this ICR are not published formally. They are used to calculate agency-level accomplishments and site-specific impacts on publicly available EPA websites.

1. **DISPLAY OF EXPIRATION DATE**

*If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.*

All instruments will display the expiration date for OMB approval of the information collection.

1. **CERTIFICATION STATEMENT**

*Explain each exception to the topics of the certification statement identified in “Certification for Paperwork Reduction Act Submissions.”*

EPA does not seek any exceptions to the topics for the certification statement identified in the “Certification for Paperwork Reduction Act Submissions.”

**Table 1a: Annual Respondent Burden and Cost – NESHAP for Aerospace Manufacturing and Rework Facilities (40 CFR Part 63, Subpart GG) (Renewal) (Cleaning Operations)**

|  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- |
| **Burden item** | **(A) Person hours per occurrence** | **(B) No. of occurrences per respondent per year** | **(C) Person hours per respondent per year (C=AxB)** | **(D) Respondents per year a** | **(E) Technical person- hours per year (E=CxD)** | **(F) Management person hours per year (F=Ex0.05)** | **(G) Clerical person hours per year (G=Ex0.1)** | **(H) Total Cost Per Year b** |
| 1. Applications | N/A |   |   |   |   |   |   |   |
| 2. Surveys and studies | N/A |   |   |   |   |   |   |   |
| 3. Reporting requirements |   |   |   |   |   |   |   |   |
| A. Familiarize with regulatory requirements c | 1 | 1 | 1 | 108 | 108 | 5.4 | 10.8 | $15,661.03  |
| B. Required activities  | N/A |   |   |   |   |   |   |   |
| C. Create information | See 3E & 4C |   |   |   |   |   |   |   |
| D. Gather existing information | See 3E & 4C |   |   |   |   |   |   |   |
| E. Write report |   |   |   |   |   |   |   |   |
| Notification of construction/reconstruction | 2 | 1 | 2 | 0 | 0 | 0 | 0 | $0  |
| Notification of physical and operational changes d | 8 | 1 | 8 | 5 | 40 | 2 | 4 | $5,800.38  |
| Notification of actual startup | 2 | 1 | 2 | 0 | 0 | 0 | 0 | $0  |
| Notification of change in production capacity | 2 | 1 | 2 | 0 | 0 | 0 | 0 | $0  |
| Compliance status information report e | 20 | 1 | 20 | 108 | 2,160 | 108 | 216 | $313,220.52  |
| Waiver application f | 4 | 1 | 4 | 11 | 44 | 2.2 | 4.4 | $6,380.42  |
| Preparation of site-specific test plan | N/A |   |   |   |   |   |   |   |
| Notification of initial performance test | N/A |   |   |   |   |   |   |   |
| Report of initial test  | N/A |   |   |   |   |   |   |   |
| Semiannual report – including report of periods of noncompliance g | 12 | 2 | 24 | 86 | 2,064 | 103.2 | 206.4 | $299,299.61  |
| **Subtotal for Reporting Requirements** |   |   |   |   | ***5,078*** | ***$640,362***  |
| 4. Recordkeeping requirements |   |   |   |   |   |   |   |   |
| A. Familiarize with regulatory requirements | See 3A |   |   |   |   |   |   |   |
| B. Plan activities | 4 | 1 | 4 | 108 | 432 | 21.6 | 43.2 | $62,644.10  |
| C. Implement activities |   |   |   |   |   |   |   |   |
| Solvent information records | 4 | 2 | 8 | 108 | 864 | 43.2 | 86.4 | $125,288.21  |
| Approved composition solvent records (demonstrating compliance) h | 4 | 1 | 4 | 32 | 128 | 6.4 | 12.8 | $18,561.22  |
| Non-approved list solvent usage records i | 1 | 12 | 12 | 97 | 1,164 | 58.2 | 116.4 | $168,791.06  |
| Solvent usage log for exempt processes j | 0.5 | 12 | 6 | 76 | 456 | 22.8 | 45.6 | $66,124.33  |
| Log of gun cleaner leaks k | 1 | 6 | 6 | 22 | 132 | 6.6 | 13.2 | $19,141.25  |
| D. Develop record system l | 20 | 1 | 20 | 108 | 2,160 | 108 | 216 | $313,220.52  |
| E. Time to enter information |   |   |   |   |   |   |   |   |
| Records of all measurements and information required by standard | See 4C |   |   |   |   |   |   |   |
| F. Time to train personnel m | 4 | 50 | 200 | 108 | 21,600 | 1,080 | 2,160 | $3,132,205.20  |
| G. Time for audits | 20 | 1 | 20 | 108 | 2,160 | 108 | 216 | $313,220.52  |
| **Subtotal for Recordkeeping Requirements**  |   |   |   |   | ***33,460*** | ***$4,219,196***  |
| **TOTAL LABOR BURDEN AND COST (rounded) n** |  |  |  |  | **38,500** | **$4,860,000**  |
| **TOTAL CAPITAL AND O&M COST (rounded) n, o** |   |   |   |   |   |   |   | **$168,000**  |
| **GRAND TOTAL (rounded) n** |   |   |   |   |   |   |   | **$5,030,000**  |

**Assumptions:**

1. We have assumed that the average number of respondents that will be subject to this rule will be 144. Of the 144 respondents, 108 are privately-owned and 36 are Federally owned. There will be no new additional sources during the next three years of this ICR.
2. This ICR uses the following labor rates: $163.17 ($77.70 + 110%) per hour for Executive, Administrative, and Managerial labor; $130.28 ($62.04 + 110%) per hour for Technical labor, and $65.71 ($31.29 + 110%) per hour for Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, September 2022, “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.
3. We have assumed all existing sources will have to re-familiarize with regulatory requirements each year.
4. We have assumed that 5 percent of the total existing facilities will write the physical and operational changes report (108 x 5% = 5.4, rounded to 5).
5. We have assumed that each respondent will write compliance status information report.
6. We have assumed that 10 percent of the respondents will request a waiver (108 x 10% = 10.8, rounded to 11).
7. We have assumed that 80 percent of facilities will have excess emissions or will change their process in some way and will submit semiannual reports (108 x 80% = 86.4, rounded to 86).
8. We have assumed that 30 percent of facilities will use the approved list of solvents (108 x 30% = 32.4, rounded to 32).
9. We have assumed that 90 percent of facilities will use some solvents not on the approved list (108 x 90% = 97.2, rounded to 97).
10. We have assumed that 70 percent of facilities will use some solvents for exempt processes (108 x 70% = 75.6, rounded to 76).
11. We have assumed that 20 percent of facilities will have a leak in their enclosed gun cleaner (108 x 20% = 21.6, rounded to 22).
12. We have assumed that all facilities will need to develop a record keeping system.
13. We have assumed that each respondent will take 4 hours 50 times per year to complete task.
14. Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.
15. The total capital and O&M cost in this table are the total for cleaning, coating, depainting and specialty coating operations combined (see Tables 1b-1d for burden associated with these operations).

**Table 1b: Annual Respondent Burden and Cost – NESHAP for Aerospace Manufacturing and Rework Facilities (40 CFR Part 63, Subpart GG) (Renewal) (Coating Operations)**

|  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- |
| **Burden item** | **(A) Person hours per occurrence** | **(B) No. of occurrences per respondent per year** | **(C) Person hours per respondent per year (C=AxB)** | **(D) Respondents per year a** | **(E) Technical person- hours per year (E=CxD)** | **(F) Management person hours per year (F=Ex0.05)** | **(G) Clerical person hours per year (G=Ex0.1)** | **(H) Total Cost Per Year b** |
| 1. Applications | N/A |   |   |   |   |   |   |   |
| 2. Surveys and studies | N/A |   |   |   |   |   |   |   |
| 3. Reporting requirements |   |   |   |   |   |   |   |   |
| A. Familiarize with regulatory requirements c | 1 | 1 | 1 | 4 | 4 | 0.2 | 0.4 | $580.04  |
| B. Required activities  | N/A |   |   |   |   |   |   |   |
| Initial performance tests  | 280 | 1 | 280 | 0 | 0 | 0 | 0 | $0  |
| Repeat performance test  | 280 | 1 | 280 | 0 | 0 | 0 | 0 | $0  |
| C. Create information | See 3E & 4C |   |   |   |   |   |   |   |
| D. Gather existing information | See 3E & 4C |   |   |   |   |   |   |   |
| E. Write report |   |   |   |   |   |   |   |   |
| Notification of construction/reconstruction | 2 | 1 | 2 | 0 | 0 | 0 | 0 | $0  |
| Notification of physical and operational changes  | 8 | 1 | 8 | 0 | 0 | 0 | 0 | $0  |
| Notification of actual startup | 2 | 1 | 2 | 0 | 0 | 0 | 0 | $0  |
| Notification of change in production capacity | 2 | 1 | 2 | 0 | 0 | 0 | 0 | $0  |
| Compliance status information report g | 10 | 1 | 10 | 4 | 40 | 2 | 4 | $5,800.38  |
| Waiver application  | 4 | 1 | 4 | 0 | 0 | 0 | 0 | $0  |
| Preparation of site-specific test plan | N/A |   |   |   |   |   |   |   |
| Notification of initial performance test | 2 | 1 | 2 | 0 | 0 | 0 | 0 | $0  |
| Report of initial test  | See 3B |   |   |   |   |   |   |   |
| Annual and semiannual report – including report of periods of noncompliance d | 12 | 2 | 24 | 3 | 72 | 3.6 | 7.2 | $10,440.68  |
| **Subtotal for Reporting Requirements** |   |   |   |   | **133** | **$16,821**  |
| 4. Recordkeeping requirements |   |   |   |   |   |   |   |   |
| A. Familiarize with regulatory requirements | See 3A |   |   |   |   |   |   |   |
| B. Plan activities | 4 | 1 | 4 | 4 | 16 | 0.8 | 1.6 | $2,320.15  |
| C. Implement activities e |   |   |   |   |   |   |   |   |
| Chemical stripper records (demonstrating compliance) | 8 | 1 | 8 | 3 | 24 | 1.2 | 2.4 | $3,480.23  |
| Chemical stripper usage log | 1 | 12 | 12 | 3 | 36 | 1.8 | 3.6 | $5,220.34  |
| Depainting equipment malfunction log | 4 | 3 | 12 | 2 | 24 | 1.2 | 2.4 | $3,480.23  |
| Exempt stripper usage log and reworked airplane log spot stripping and decal removal | 1 | 12 | 12 | 4 | 48 | 2.4 | 4.8 | $6,960.46  |
| Record of parts removed for parts depainting | 8 | 2 | 16 | 4 | 64 | 3.2 | 6.4 | $9,280.61  |
| Control device maintenance log | 0.5 | 250 | 125 | 2 | 250 | 12.5 | 25 | $36,252.38  |
| D. Develop record system f | 10 | 1 | 10 | 4 | 40 | 2 | 4 | $5,800.38  |
| E. Time to enter information |   |   |   |   |   |   |   |   |
| Records of all measurements and information required by standard | See 4C |   |   |   |   |   |   |   |
| F. Time to train personnel  | 4 | 1 | 4 | 4 | 16 | 0.8 | 1.6 | $2,320.15  |
| G. Time for audits | 10 | 1 | 10 | 4 | 40 | 2 | 4 | $5,800.38  |
| **Subtotal for Recordkeeping Requirements**  |   |   |   |   | **642** | **$80,915** |
| **TOTAL LABOR BURDEN AND COST (rounded) h** |  |  |  |  | **775** | **$97,700**  |
| **TOTAL CAPITAL AND O&M COST (rounded) h, i** |   |   |   |   |   |   |   | **$0**  |
| **GRAND TOTAL (rounded) h** |   |   |   |   |   |   |   | **$97,700**  |

**Assumptions:**

1. We have assumed that the average number of respondents that will be subject to this rule will be 144. Of the 144 respondents, 108 are privately-owned and 36 are Federally owned. There will be no new additional sources during the next three years of this ICR. Of the 144 facilities we assume 4 privately-owned facilities and 1 Federally owned facility will have depainting operations.
2. This ICR uses the following labor rates: $163.17 ($77.70 + 110%) per hour for Executive, Administrative, and Managerial labor; $130.28 ($62.04 + 110%) per hour for Technical labor, and $65.71 ($31.29 + 110%) per hour for Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, September 2022, “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.
3. We have assumed all existing sources will have to re-familiarize with regulatory requirements each year.
4. We have assumed that 80 percent of facilities will have excess emissions or will change their process in some way and will submit semiannual reports (4 x 80% = 3.2, rounded to 3).
5. We have assumed that 1 percent of facilities will use HAP containing chemical strippers as the primary stripping techniques, 29 percent will use media blasting equipment, 70 percent will use non-HAP chemical strippers, and 100 percent of facilities will use some HAP stripper for exempt processes.
6. We have assumed that all respondents will need to develop a record keeping system.
7. We have assumed that each respondent will write compliance status information report.
8. Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.
9. The capital and O&M cost for this operation has been included in the table for cleaning operations (see Table 1a).

**Table 1d: Annual Respondent Burden and Cost – NESHAP for Aerospace Manufacturing and Rework Facilities (40 CFR Part 63, Subpart GG) (Renewal) (Specialty Coating Operations)**

|  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- |
| **Burden item** | **(A) Person hours per occurrence** | **(B) No. of occurrences per respondent per year** | **(C) Person hours per respondent per year (C=AxB)** | **(D) Respondents per year a** | **(E) Technical person- hours per year (E=CxD)** | **(F) Management person hours per year (F=Ex0.05)** | **(G) Clerical person hours per year (G=Ex0.1)** | **(H) Total Cost Per Year b** |
| 1. Applications |   |   |   |   |   |   |   |   |
| 2. Surveys and studies |   |   |   |   |   |   |   |   |
| 3. Reporting requirements |   |   |   |   |   |   |   |   |
| A. Familiarize with regulatory requirements c | 1 | 1 | 1 | 82 | 82 | 4.1 | 8.2 | $11,890.78  |
| B. Required activities  |   |   |   |   |   |   |   |   |
| Initial performance tests  | N/A |   |   |   |   |   |   |   |
| Repeat performance test  | N/A |   |   |   |   |   |   |   |
| C. Create information | See 4C |   |   |   |   |   |   |   |
| D. Gather existing information | See 4C |   |   |   |   |   |   |   |
| E. Write report e |   |   |   |   |   |   |   |   |
| Notification of construction/reconstruction | N/A |   |   |   |   |   |   |   |
| Notification of physical and operational changes  | N/A |   |   |   |   |   |   |   |
| Notification of actual startup | N/A |   |   |   |   |   |   |   |
| Notification of change in production capacity | N/A |   |   |   |   |   |   |   |
| Compliance status information report | N/A |   |   |   |   |   |   |   |
| Waiver application  | N/A |   |   |   |   |   |   |   |
| Preparation of site-specific test plan | N/A |   |   |   |   |   |   |   |
| Notification of initial performance test | N/A |   |   |   |   |   |   |   |
| Report of initial test  | N/A |   |   |   |   |   |   |   |
| Annual and semiannual report – including report of periods of noncompliance | N/A |   |   |   |   |   |   |   |
| ***Subtotal for Reporting Requirements*** |  |  |   |   | **94** | **$11,891**  |
| 4. Recordkeeping requirements |  |  |   |   |   |   |   |   |
| A. Familiarize with regulatory requirements | See 3A |   |   |   |   |   |   |   |
| B. Plan activities d | 4 | 1 | 4 | 0 | 0 | 0 | 0 | $0  |
| C. Implement activities  |   |   |   |   |   |   |   |   |
| Compliance coating records f | 30.5 | 1 | 30.5 | 82 | 2,501 | 125.05 | 250.1 | $362,668.76  |
| Control device maintenance or rolling material balance log (organics) e | N/A |   |   |   |   |   |   |   |
| Control device maintenance log (inorganics) e | N/A |   |   |   |   |   |   |   |
| D. Develop record system d | 10 | 1 | 10 | 0 | 0 | 0 | 0 | $0  |
| E. Time to enter information |   |   |   |   |   |   |   |   |
| Records of all measurements and information required by standard | See 4C |   |   |   |   |   |   |   |
| F. Time to train personnel d, g | 2 | 3 | 6 | 0 | 0 | 0 | 0 | $0  |
| G. Time for audits h | 10 | 1 | 10 | 82 | 820 | 41 | 82 | $118,907.79  |
| **Subtotal for Recordkeeping Requirements**  |   |   |   |   | **3,819** | **$481,577**  |
| **TOTAL LABOR BURDEN AND COST (rounded) i** |   |   |   |   | **3,910** | **$493,000**  |
| **TOTAL CAPITAL AND O&M COST (rounded) i, j** |   |   |   |   |   |   |   | **$0**  |
| **GRAND TOTAL (rounded) i** |   |   |   |   |   |   |   | **$493,000**  |

**Assumptions:**

1. We have assumed that the average number of respondents that will be subject to this rule will be 144. Of the 144 respondents, 108 are privately-owned and 36 are Federally owned. There will be no new additional sources during the next three years of this ICR. Of the 144 facilities we assume 82 privately-owned facilities and 27 Federally owned facilities will have specialty coating operations.
2. This ICR uses the following labor rates: $163.17 ($77.70 + 110%) per hour for Executive, Administrative, and Managerial labor; $130.28 ($62.04 + 110%) per hour for Technical labor, and $65.71 ($31.29 + 110%) per hour for Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, September 2022, “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.
3. We have assumed all existing sources will have to re-familiarize with regulatory requirements each year.
4. One-time cost that is only incurred during the first year of compliance.
5. We have assumed that specialty coatings operations will not require installation of additional booths and control devices, and that the costs associated with these devices is covered under the compliance costs for coating operations.
6. These costs vary by facility and are calculated assuming one hour per year per specialty coating used. The 2015 amendment provides a separate worksheet which breaks down the assumed number of specialty coatings by facility based on 2011 ICR survey responses. This ICR averages the hours over the 82 facilities to get ~30.5 person hours per occurrence.
7. We have assumed one person per shift will require training on recordkeeping requirements and system.
8. We have assumed auditing activities will coincide with similar activities for coating operations, so would entail about half the effort assumed for the same activity in coating operations.
9. Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.
10. The capital and O&M cost for this operation has been included in the table for cleaning operations (see Table 1a).

**Table 1e: Summary of Annual Respondent Burden and Cost for Tables 1a, 1b, 1c, & 1d – NESHAP for Aerospace Manufacturing and Rework Facilities (40 CFR Part 63, Subpart GG) (Renewal)**

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| **Burden**  | **Burden Hours per Year for Reporting** | **Burden Hours per Year for Recordkeeping** | **Total Burden Hours per Year (rounded) a** | **Total Annual Labor Costs ($)(rounded) a** | **Total Annual Costs ($) (rounded) a, b** |
| 1a. Cleaning Operations | 5,078 | 33,460 | 38,500 | $4,860,000  | $5,030,000  |
| 1b. Coating Operations | 4,934 | 66,749 | 71,700 | $9,040,000  | $9,040,000  |
| 1c. Depainting Operations | 133 | 642 | 775 | $97,700  | $97,700  |
| 1d. Specialty Coating Operations | 94 | 3,819 | 3,910 | $493,000  | $493,000  |
| **Total Burden and Costs (rounded)** | **10,200** | **105,000** | **115,000** | **$14,500,000**  | **$14,700,000**  |

**Assumptions:**

1. Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.
2. The total annual costs includes both labor and capital and O&M costs.

**Table 2a: Annual Burden and Cost for Federal Government-Owned Facilities – NESHAP for Aerospace Manufacturing and Rework Facilities (40 CFR Part 63, Subpart GG) (Renewal) (Cleaning Operations)**

|  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- |
| **Burden item** | **(A) Person hours per occurrence** | **(B) No. of occurrences per respondent per year** | **(C) Person hours per respondent per year (C=AxB)** | **(D) Respondents per year a** | **(E) Technical person- hours per year (E=CxD)** | **(F) Management person hours per year (F=Ex0.05)** | **(G) Clerical person hours per year (G=Ex0.1)** | **(H) Total Cost Per Year b** |
| 1. Applications | N/A |   |   |   |   |   |   |   |
| 2. Surveys and studies | N/A |   |   |   |   |   |   |   |
| 3. Reporting requirements |   |   |   |   |   |   |   |   |
| A. Familiarize with regulatory requirements c | 1 | 1 | 1 | 36 | 36 | 1.8 | 3.6 | $2,200.79  |
| B. Required activities  | N/A |   |   |   |   |   |   |   |
| C. Create information | See 3E & 4C |   |   |   |   |   |   |   |
| D. Gather existing information | See 3E & 4C |   |   |   |   |   |   |   |
| E. Write report |   |   |   |   |   |   |   |   |
| Notification of construction/reconstruction | 2 | 1 | 2 | 0 | 0 | 0 | 0 | $0  |
| Notification of physical and operational changes d | 8 | 1 | 8 | 2 | 16 | 0.8 | 1.6 | $978.13  |
| Notification of actual startup | 2 | 1 | 2 | 0 | 0 | 0 | 0 | $0  |
| Notification of change in production capacity | 2 | 1 | 2 | 0 | 0 | 0 | 0 | $0  |
| Compliance status information report e | 20 | 1 | 20 | 36 | 720 | 36 | 72 | $44,015.76  |
| Waiver application f | 4 | 1 | 4 | 4 | 16 | 0.8 | 1.6 | $978.13  |
| Preparation of site-specific test plan | N/A |   |   |   |   |   |   |   |
| Notification of initial performance test | N/A |   |   |   |   |   |   |   |
| Report of initial test  | N/A |   |   |   |   |   |   |   |
| Semiannual report – including report of periods of noncompliance g | 12 | 2 | 24 | 29 | 696 | 34.8 | 69.6 | $42,548.57  |
| **Subtotal for Reporting Requirements** |   |   |   |   | **1,707** | **$90,721**  |
| 4. Recordkeeping requirements |   |   |   |   |   |   |   |   |
| A. Familiarize with regulatory requirements | See 3A |   |   |   |   |   |   |   |
| B. Plan activities | 4 | 1 | 4 | 36 | 144 | 7.2 | 14.4 | $8,803.15  |
| C. Implement activities |   |   |   |   |   |   |   |   |
| Solvent information records | 4 | 2 | 8 | 36 | 288 | 14.4 | 28.8 | $17,606.30  |
| Approved composition solvent records (demonstrating compliance) h | 4 | 1 | 4 | 11 | 44 | 2.2 | 4.4 | $2,689.85  |
| Non-approved list solvent usage records i | 1 | 12 | 12 | 32 | 384 | 19.2 | 38.4 | $23,475.07  |
| Solvent usage log for exempt processes j | 0.5 | 12 | 6 | 25 | 150 | 7.5 | 15 | $9,169.95  |
| Log of gun cleaner leaks k | 1 | 6 | 6 | 7 | 42 | 2.1 | 4.2 | $2,567.59  |
| D. Develop record system l | 20 | 1 | 20 | 36 | 720 | 36 | 72 | $44,015.76  |
| E. Time to enter information |   |   |   |   |   |   |   |   |
| Records of all measurements and information required by standard | See 4C |   |   |   |   |   |   |   |
| F. Time to train personnel m | 4 | 50 | 200 | 36 | 7,200 | 360 | 720 | $440,157.60  |
| G. Time for audits | 20 | 1 | 20 | 36 | 720 | 36 | 72 | $44,015.76  |
| **Subtotal for Recordkeeping Requirements**  |   |   |   |   | **11,146** | **$592,501**  |
| **TOTAL LABOR BURDEN AND COST (rounded) n** |  |  |  |  | **12,900** | **$683,000**  |
| **TOTAL CAPITAL AND O&M COST (rounded) n, o** |   |   |   |   |   |   |   | **$55,900**  |
| **GRAND TOTAL (rounded) n** |   |   |   |   |   |   |   | **$739,000**  |

**Assumptions:**

1. We have assumed that the average number of respondents that will be subject to this rule will be 144. Of the 144 respondents, 108 are privately-owned and 36 are Federally owned. There will be no new additional sources during the next three years of this ICR.
2. The cost is based on the following labor rates: Managerial rate of $73.46 (GS-13, Step 5, $45.91 + 60%), Technical rate of $54.51 (GS-12, Step 1, $34.07 + 60%), and Clerical rate of $29.50 (GS-6, Step 3, $18.44 + 60%). These rates are from the Office of Personnel Management (OPM), 2023 General Schedule, which excludes locality, rates of pay. The rates have been increased by 60 percent to account for the benefit packages available to government employees.
3. We have assumed all existing sources will have to re-familiarize with regulatory requirements each year.
4. We have assumed that 5 percent of the total existing facilities will write the physical and operational changes report (36 x 5% = 1.8, rounded to 2).
5. We have assumed that each respondent will write compliance status information report.
6. We have assumed that 10 percent of the respondents will request a waiver (36 x 10% = 3.6, rounded to 4).
7. We have assumed that 80 percent of facilities will have excess emissions or will change their process in some way and will submit semiannual reports (36 x 80% = 28.8, rounded to 29).
8. We have assumed that 30 percent of facilities will use the approved list of solvents (36 x 30% = 10.8, rounded to 11).
9. We have assumed that 90 percent of facilities will use some solvents not on the approved list (36 x 90% = 32.4, rounded to 32).
10. We have assumed that 70 percent of facilities will use some solvents for exempt processes (36 x 70% = 25.2, rounded to 25).
11. We have assumed that 20 percent of facilities will have a leak in their enclosed gun cleaner (36 x 20% = 7.2, rounded to 7).
12. We have assumed that all facilities will need to develop a record keeping system.
13. We have assumed that each respondent will take 4 hours 50 times per year to complete task.
14. Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.
15. The total capital and O&M cost in this table are the total for cleaning, coating, depainting and specialty coating operations combined (see Tables 1b-1d for burden associated with these operations).

**Table 2b: Annual Burden and Cost for Federal Government-Owned Facilities – NESHAP for Aerospace Manufacturing and Rework Facilities (40 CFR Part 63, Subpart GG) (Renewal) (Coating Operations)**

|  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- |
| **Burden item** | **(A) Person hours per occurrence** | **(B) No. of occurrences per respondent per year** | **(C) Person hours per respondent per year (C=AxB)** | **(D) Respondents per year a** | **(E) Technical person- hours per year (E=CxD)** | **(F) Management person hours per year (F=Ex0.05)** | **(G) Clerical person hours per year (G=Ex0.1)** | **(H) Total Cost Per Year b** |
| 1. Applications | N/A |   |   |   |   |   |   |   |
| 2. Surveys and studies | N/A |   |   |   |   |   |   |   |
| 3. Reporting requirements |   |   |   |   |   |   |   |   |
| A. Familiarize with regulatory requirements c | 1 | 1 | 1 | 36 | 36 | 1.8 | 3.6 | $2,200.79  |
| B. Required activities  |   |   |   |   |   |   |   |   |
| Initial performance tests d | 280 | 1 | 280 | 1 | 280 | 14 | 28 | $17,117.24  |
| Repeat performance test e | 280 | 1 | 280 | 0 | 0 | 0 | 0 | $0  |
| C. Create information | See 3E & 4C |   |   |   |   |   |   |   |
| D. Gather existing information | See 3E & 4C |   |   |   |   |   |   |   |
| E. Write report |   |   |   |   |   |   |   |   |
| Notification of construction/reconstruction | 2 | 1 | 2 | 0 | 0 | 0 | 0 | $0  |
| Notification of physical and operational changes f | 8 | 1 | 8 | 2 | 16 | 0.8 | 1.6 | $978.13  |
| Notification of actual startup | 2 | 1 | 2 | 0 | 0 | 0 | 0 | $0  |
| Notification of change in production capacity | 2 | 1 | 2 | 0 | 0 | 0 | 0 | $0  |
| Compliance status information report k | 10 | 1 | 10 | 36 | 360 | 18 | 36 | $22,007.88  |
| Waiver application g | 4 | 1 | 4 | 4 | 16 | 0.8 | 1.6 | $978.13  |
| Preparation of site-specific test plan | See 3B |   |   |   |   |   |   |   |
| Notification of initial performance test d | 2 | 1 | 2 | 1 | 2 | 0.1 | 0.2 | $122.27  |
| Report of initial test  | See 3B |   |   |   |   |   |   |   |
| Annual and semiannual report – including report of periods of noncompliance h | 11 | 2 | 22 | 29 | 638 | 31.9 | 63.8 | $39,002.85  |
| ***Subtotal for Reporting Requirements*** |   |   |   |   | **1,550** | **$82,407**  |
| 4. Recordkeeping requirements |   |   |   |   |   |   |   |  |
| A. Familiarize with regulatory requirements | See 3A |   |   |   |   |   |   |  |
| B. Plan activities | 4 | 1 | 4 | 36 | 144 | 7.2 | 14.4 | $8,803.15  |
| C. Implement activities |   |   |   |   |   |   |   |   |
| Compliance coating records | 1 | 12 | 12 | 36 | 432 | 21.6 | 43.2 | $26,409.46  |
| Daily records of weighted average mass i | 1 | 250 | 250 | 4 | 1,000 | 50 | 100 | $61,133.00  |
| Control device maintenance or rolling material balance log (organics) d | 0.5 | 250 | 125 | 1 | 125 | 6.25 | 12.5 | $7,641.63  |
| Control device maintenance log (inorganics) | 0.25 | 250 | 62.5 | 36 | 2,250 | 112.5 | 225 | $137,549.25  |
| D. Develop record system j | 10 | 1 | 10 | 36 | 360 | 18 | 36 | $22,007.88  |
| E. Time to enter/maintain information |   |   |   |   |   |   |   |   |
| Records of all measurements and information required by standard | See 4C |   |   |   |   |   |   |   |
| F. Time to train personnel  | 8 | 50 | 400 | 36 | 14,400 | 720 | 1,440 | $880,315.20  |
| G. Time for audits | 20 | 1 | 20 | 36 | 720 | 36 | 72 | $44,015.76  |
| ***Subtotal for Recordkeeping Requirements***  |   |   |   |   | **22,346** | **$1,187,875**  |
| **TOTAL LABOR BURDEN AND COST (rounded) l** |   |   |   |   | **23,900** | **$1,270,000**  |
| **TOTAL CAPITAL AND O&M COST (rounded) l, m** |   |   |   |   |   |   |   | **$0**  |
| **GRAND TOTAL (rounded) l** |   |   |   |   |   |   |   | **$1,270,000**  |

**Assumptions:**

1. We have assumed that the average number of respondents that will be subject to this rule will be 144. Of the 144 respondents, 108 are privately-owned and 36 are Federally owned. There will be no new additional sources during the next three years of this ICR.
2. The cost is based on the following labor rates: Managerial rate of $73.46 (GS-13, Step 5, $45.91 + 60%), Technical rate of $54.51 (GS-12, Step 1, $34.07 + 60%), and Clerical rate of $29.50 (GS-6, Step 3, $18.44 + 60%). These rates are from the Office of Personnel Management (OPM), 2023 General Schedule, which excludes locality, rates of pay. The rates have been increased by 60 percent to account for the benefit packages available to government employees.
3. We have assumed all existing sources will have to re-familiarize with regulatory requirements each year.
4. We assume that 1 Federally owned facility will use add-on control equipment for maskant application.
5. We have assumed that 20% of Federally owned facility with add-on control equipment will repeat performance test (1 x 20% = 0.2, rounded to 0).
6. We have assumed that 5 percent of the total existing facilities will write the physical and operational changes report (36 x 5% = 1.8, rounded to 2).
7. We have assumed that 10 percent of the respondents will request a waiver (36 x 10% = 3.6, rounded to 4).
8. We have assumed that 80 percent of facilities will have excess emissions or will change their process in some way and will submit semiannual reports (36 x 80% = 28.8, rounded to 29).
9. The final rule required monthly records. Daily averaging was included in the cost analysis because 90 percent of the industry is located in non-attainment areas and will be required to use daily averaging by the permitting agency.
10. We have assumed that all facilities will need to develop a record keeping system.
11. We have assumed that each respondent will write compliance status information report.
12. Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.
13. The capital and O&M cost for this operation has been included in the table for cleaning operations (see Table 1a).

**Table 2c: Annual Burden and Cost for Federal Government-Owned Facilities – NESHAP for Aerospace Manufacturing and Rework Facilities (40 CFR Part 63, Subpart GG) (Renewal) (Depainting Operations)**

|  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- |
| **Burden item** | **(A) Person hours per occurrence** | **(B) No. of occurrences per respondent per year** | **(C) Person hours per respondent per year (C=AxB)** | **(D) Respondents per year a** | **(E) Technical person- hours per year (E=CxD)** | **(F) Management person hours per year (F=Ex0.05)** | **(G) Clerical person hours per year (G=Ex0.1)** | **(H) Total Cost Per Year b** |
| 1. Applications | N/A |   |   |   |   |   |   |   |
| 2. Surveys and studies | N/A |   |   |   |   |   |   |   |
| 3. Reporting requirements |   |   |   |   |   |   |   |   |
| A. Familiarize with regulatory requirements c | 1 | 1 | 1 | 1 | 1 | 0.05 | 0.1 | $61.13  |
| B. Required activities  | N/A |   |   |   |   |   |   |   |
| Initial performance tests  | 280 | 1 | 280 | 0 | 0 | 0 | 0 | $0  |
| Repeat performance test  | 280 | 1 | 280 | 0 | 0 | 0 | 0 | $0  |
| C. Create information | See 3E & 4C |   |   |   |   |   |   |   |
| D. Gather existing information | See 3E & 4C |   |   |   |   |   |   |   |
| E. Write report |   |   |   |   |   |   |   |   |
| Notification of construction/reconstruction | 2 | 1 | 2 | 0 | 0 | 0 | 0 | $0  |
| Notification of physical and operational changes  | 8 | 1 | 8 | 0 | 0 | 0 | 0 | $0  |
| Notification of actual startup | 2 | 1 | 2 | 0 | 0 | 0 | 0 | $0  |
| Notification of change in production capacity | 2 | 1 | 2 | 0 | 0 | 0 | 0 | $0  |
| Compliance status information report g | 10 | 1 | 10 | 1 | 10 | 0.5 | 1 | $611.33  |
| Waiver application  | 4 | 1 | 4 | 0 | 0 | 0 | 0 | $0  |
| Preparation of site-specific test plan | N/A |   |   |   |   |   |   |   |
| Notification of initial performance test | 2 | 1 | 2 | 0 | 0 | 0 | 0 | $0  |
| Report of initial test  | See 3B |   |   |   |   |   |   |   |
| Annual and semiannual report – including report of periods of noncompliance d | 12 | 2 | 24 | 1 | 24 | 1.2 | 2.4 | $1,467.19  |
| **Subtotal for Reporting Requirements** |   |   |   |   | **40** | **$2,140**  |
| 4. Recordkeeping requirements |   |   |   |   |   |   |   |   |
| A. Familiarize with regulatory requirements | See 3A |   |   |   |   |   |   |   |
| B. Plan activities | 4 | 1 | 4 | 1 | 4 | 0.2 | 0.4 | $244.53  |
| C. Implement activities e |   |   |   |   |   |   |   |   |
| Chemical stripper records (demonstrating compliance) | 8 | 1 | 8 | 1 | 8 | 0.4 | 0.8 | $489.06  |
| Chemical stripper usage log | 1 | 12 | 12 | 1 | 12 | 0.6 | 1.2 | $733.60  |
| Depainting equipment malfunction log | 4 | 3 | 12 | 0 | 0 | 0 | 0 | $0  |
| Exempt stripper usage log and reworked airplane log spot stripping and decal removal | 1 | 12 | 12 | 1 | 12 | 0.6 | 1.2 | $733.60  |
| Record of parts removed for parts depainting | 8 | 2 | 16 | 1 | 16 | 0.8 | 1.6 | $978.13  |
| Control device maintenance log | 0.5 | 250 | 125 | 0 | 0 | 0 | 0 | $0  |
| D. Develop record system f | 10 | 1 | 10 | 1 | 10 | 0.5 | 1 | $611.33  |
| E. Time to enter information |   |   |   |   |   |   |   |   |
| Records of all measurements and information required by standard | See 4C |   |   |   |   |   |   |   |
| F. Time to train personnel  | 4 | 1 | 4 | 1 | 4 | 0.2 | 0.4 | $244.53  |
| G. Time for audits | 10 | 1 | 10 | 1 | 10 | 0.5 | 1 | $611.33  |
| **Subtotal for Recordkeeping Requirements**  |   |   |   |   | **87** | **$4,646**  |
| **TOTAL LABOR BURDEN AND COST (rounded) h** |  |  |  |  | **128** | **$6,790**  |
| **TOTAL CAPITAL AND O&M COST (rounded) h, i** |   |   |   |   |   |   |   | **$0**  |
| **GRAND TOTAL (rounded) h** |   |   |   |   |   |   |   | **$6,790**  |

**Assumptions:**

1. We have assumed that the average number of respondents that will be subject to this rule will be 144. Of the 144 respondents, 108 are privately-owned and 36 are Federally owned. There will be no new additional sources during the next three years of this ICR. Of the 144 facilities we assume 4 privately-owned facilities and 1 Federally owned facility will have depainting operations.
2. The cost is based on the following labor rates: Managerial rate of $73.46 (GS-13, Step 5, $45.91 + 60%), Technical rate of $54.51 (GS-12, Step 1, $34.07 + 60%), and Clerical rate of $29.50 (GS-6, Step 3, $18.44 + 60%). These rates are from the Office of Personnel Management (OPM), 2023 General Schedule, which excludes locality, rates of pay. The rates have been increased by 60 percent to account for the benefit packages available to government employees.
3. We have assumed all existing sources will have to re-familiarize with regulatory requirements each year.
4. We have assumed that 80 percent of facilities will have excess emissions or will change their process in some way and will submit semiannual reports (1 x 80% = 0.8, rounded to 1).
5. We have assumed that 1 percent of facilities will use HAP containing chemical strippers as the primary stripping techniques, 29 percent will use media blasting equipment, 70 percent will use non-HAP chemical strippers, and 100 percent of facilities will use some HAP stripper for exempt processes.
6. We have assumed that all respondents will need to develop a record keeping system.
7. We have assumed that each respondent will write compliance status information report.
8. Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.
9. The capital and O&M cost for this operation has been included in the table for cleaning operations (see Table 1a).

**Table 2d: Annual Burden and Cost for Federal Government-Owned Facilities – NESHAP for Aerospace Manufacturing and Rework Facilities (40 CFR Part 63, Subpart GG) (Renewal) (Specialty Coating Operations)**

|  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- |
| **Burden item** | **(A) Person hours per occurrence** | **(B) No. of occurrences per respondent per year** | **(C) Person hours per respondent per year (C=AxB)** | **(D) Respondents per year a** | **(E) Technical person- hours per year (E=CxD)** | **(F) Management person hours per year (F=Ex0.05)** | **(G) Clerical person hours per year (G=Ex0.1)** | **(H) Total Cost Per Year b** |
| 1. Applications |   |   |   |   |   |   |   |   |
| 2. Surveys and studies |   |   |   |   |   |   |   |   |
| 3. Reporting requirements |   |   |   |   |   |   |   |   |
| A. Familiarize with regulatory requirements c | 1 | 1 | 1 | 27 | 27 | 1.35 | 2.7 | $1,650.59  |
| B. Required activities  |   |   |   |   |   |   |   |   |
| Initial performance tests  | N/A |   |   |   |   |   |   |   |
| Repeat performance test  | N/A |   |   |   |   |   |   |   |
| C. Create information | See 4C |   |   |   |   |   |   |   |
| D. Gather existing information | See 4C |   |   |   |   |   |   |   |
| E. Write report e |   |   |   |   |   |   |   |   |
| Notification of construction/reconstruction | N/A |   |   |   |   |   |   |   |
| Notification of physical and operational changes  | N/A |   |   |   |   |   |   |   |
| Notification of actual startup | N/A |   |   |   |   |   |   |   |
| Notification of change in production capacity | N/A |   |   |   |   |   |   |   |
| Compliance status information report | N/A |   |   |   |   |   |   |   |
| Waiver application  | N/A |   |   |   |   |   |   |   |
| Preparation of site-specific test plan | N/A |   |   |   |   |   |   |   |
| Notification of initial performance test | N/A |   |   |   |   |   |   |   |
| Report of initial test  | N/A |   |   |   |   |   |   |   |
| Annual and semiannual report – including report of periods of noncompliance | N/A |   |   |   |   |   |   |   |
| ***Subtotal for Reporting Requirements*** |  |   |   |   | **31** | **$1,651**  |
| 4. Recordkeeping requirements |  |   |   |   |   |   |   |   |
| A. Familiarize with regulatory requirements | See 3A |   |   |   |   |   |   |   |
| B. Plan activities d | 4 | 1 | 4 | 0 | 0 | 0 | 0 | $0  |
| C. Implement activities  |   |   |   |   |   |   |   |   |
| Compliance coating records f | 61.6 | 1 | 61.6 | 27 | 1,663.2 | 83.16 | 166.32 | $101,676.41  |
| Control device maintenance or rolling material balance log (organics) e | N/A |   |   |   |   |   |   |   |
| Control device maintenance log (inorganics) e | N/A |   |   |   |   |   |   |   |
| D. Develop record system d | 10 | 1 | 10 | 0 | 0 | 0 | 0 | $0  |
| E. Time to enter information |   |   |   |   |   |   |   |   |
| Records of all measurements and information required by standard | See 4C |   |   |   |   |   |   |   |
| F. Time to train personnel d, g | 2 | 3 | 6 | 0 | 0 | 0 | 0 | $0  |
| G. Time for audits h | 10 | 1 | 10 | 27 | 270 | 13.5 | 27 | $16,505.91  |
| **Subtotal for Recordkeeping Requirements**  |   |   |   |   | **2,223** | **$118,182**  |
| **TOTAL LABOR BURDEN AND COST (rounded) i** |   |   |   |   | **2,250** | **$120,000**  |
| **TOTAL CAPITAL AND O&M COST (rounded) i, j** |   |   |   |   |   |   |   | **$0**  |
| **GRAND TOTAL (rounded) i** |   |   |   |   |   |   |   | **$120,000**  |

**Assumptions:**

1. We have assumed that the average number of respondents that will be subject to this rule will be 144. Of the 144 respondents, 108 are privately-owned and 36 are Federally owned. There will be no new additional sources during the next three years of this ICR. Of the 144 facilities we assume 82 privately-owned facilities and 27 Federally owned facilities will have specialty coating operations.
2. The cost is based on the following labor rates: Managerial rate of $73.46 (GS-13, Step 5, $45.91 + 60%), Technical rate of $54.51 (GS-12, Step 1, $34.07 + 60%), and Clerical rate of $29.50 (GS-6, Step 3, $18.44 + 60%). These rates are from the Office of Personnel Management (OPM), 2023 General Schedule, which excludes locality, rates of pay. The rates have been increased by 60 percent to account for the benefit packages available to government employees.
3. We have assumed all existing sources will have to re-familiarize with regulatory requirements each year.
4. One-time cost that is only incurred during the first year of compliance.
5. We have assumed that specialty coatings operations will not require installation of additional booths and control devices, and that the costs associated with these devices is covered under the compliance costs for coating operations.
6. These costs vary by facility and are calculated assuming one hour per year per specialty coating used. The 2015 amendment provides a separate worksheet which breaks down the assumed number of specialty coatings by facility based on 2011 ICR survey responses. This ICR averages the hours over the 27 facilities to get ~61.6 person hours per occurrence.
7. We have assumed one person per shift will require training on recordkeeping requirements and system.
8. We have assumed auditing activities will coincide with similar activities for coating operations, so would entail about half the effort assumed for the same activity in coating operations.
9. Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.
10. The capital and O&M cost for this operation has been included in the table for cleaning operations (see Table 1a).

**Table 2e: Summary of Annual Burden and Cost for Federal Government-Owned Facilities for Tables 2a, 2b, 2c, & 2d – NESHAP for Aerospace Manufacturing and Rework Facilities (40 CFR Part 63, Subpart GG) (Renewal)**

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| **Burden**  | **Burden Hours per Year for Reporting** | **Burden Hours per Year for Recordkeeping** | **Total Burden Hours per Year (rounded) a** | **Total Annual Labor Costs ($)(rounded) a** | **Total Annual Costs ($) (rounded) a, b** |
| 2a. Cleaning Operations | 1,707 | 11,146 | 12,900 | $683,000  | $739,000  |
| 2b. Coating Operations | 1,550 | 22,346 | 23,900 | $1,270,000  | $1,270,000  |
| 2c. Depainting Operations | 40 | 87 | 128 | $6,790  | $6,790  |
| 2d. Specialty Coating Operations | 31 | 2,223 | 2,250 | $120,000  | $120,000  |
| **Total Burden and Costs (rounded)** | **3,330** | **35,800** | **39,200** | **$2,080,000**  | **$2,140,000**  |

**Assumptions:**

1. Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.
2. The total annual costs includes both labor and capital and O&M costs.

**Table 3: Average Annual EPA Burden and Cost – NESHAP for Aerospace Manufacturing and Rework Facilities (40 CFR Part 63, Subpart GG) (Renewal)**

|  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- |
| **Activity** | **(A) EPA person hours per occurrence** | **(B) No. of occurrences per plant per year** | **(C) Person hours per plant per year (C=AxB)** | **(D) Plants per year a** | **(E) Technical person- hours per year (E=CxD)** | **(F) Management person hours per year (F=Ex0.05)** | **(G) Clerical person hours per year (G=Ex0.1)** | **(H) Total Cost Per Year b** |
| 1. Initial performance test | 80 | 1 | 80 | 4 | 320 | 16 | 32 | $19,562.56  |
| 2. Repeat performance test |   |   |   |   |   |   |   |   |
|  Retesting preparation c | 16 | 1 | 16 | 1 | 16 | 0.8 | 1.6 | $978.13  |
|  Retesting d | 80 | 1 | 80 | 1 | 80 | 4 | 8 | $4,890.64  |
| 3. Report review |   |   |   |   |   |   |   |   |
|  Notification of construction/reconstruction | 2 | 1 | 2 | 0 | 0 | 0 | 0 | $0  |
|  Notification of physical or operational changes e | 2 | 1 | 2 | 14 | 28 | 1.4 | 2.8 | $1,711.72  |
|  Notification of anticipated startup | 2 | 1 | 2 | 0 | 0 | 0 | 0 | $0  |
|  Notification of actual startup | 2 | 1 | 2 | 0 | 0 | 0 | 0 | $0  |
|  Notification of changes in production capacity | 2 | 1 | 2 | 0 | 0 | 0 | 0 | $0  |
|  Compliance status information report f | 6 | 1 | 6 | 293 | 1,758 | 87.9 | 175.8 | $107,471.81  |
|  Waiver application g | 6 | 1 | 6 | 30 | 180 | 9 | 18 | $11,003.94  |
|  Review of site-specific test plan | N/A |   |   |   |   |   |   |   |
|  Notification of initial performance test h | 2 | 1 | 2 | 4 | 8 | 0.4 | 0.8 | $489.06  |
|  4. Report review |   |   |   |   |   |   |   |   |
|  Report of initial test | 8 | 1 | 8 | 0 | 0 | 0 | 0 | $0  |
|  Review of annual and semiannual reports i | 3 | 2 | 6 | 234 | 1,404 | 70.2 | 140.4 | $85,830.73  |
| **TOTAL ANNUAL BURDEN AND COST (rounded) j** |   |   |   |   | **4,360** | **$232,000**  |

**Assumptions:**

1. We have assumed that the average number of respondents that will be subject to this rule will be 144. Of the 144 respondents, 108 are privately-owned and 36 are Federally owned. There will be no new additional sources during the next three years of this ICR.
2. The cost is based on the following labor rates: Managerial rate of $73.46 (GS-13, Step 5, $45.91 + 60%), Technical rate of $54.51 (GS-12, Step 1, $34.07 + 60%), and Clerical rate of $29.50 (GS-6, Step 3, $18.44 + 60%). These rates are from the Office of Personnel Management (OPM), 2023 General Schedule, which excludes locality, rates of pay. The rates have been increased by 60 percent to account for the benefit packages available to government employees.
3. We have assumed that it will take 16 hours to prepare for retesting.
4. We have assumed that 20 percent of respondents will fail the initial performance test and will have to be retested.
5. We have assumed that it will take two hours once per year to review the notification of physical or operational change.
6. We have assumed that it will take six hours to review the compliance status information report.
7. We have assumed that the Agency will take 6 hours to review the waiver application for each facility.
8. We have assumed that it will take 2 hours to review the notice of initial performance test.
9. We have assumed that it will take 3 hours to review each semiannual report.
10. Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.