

ICR Summary Information

Hours per Response	152
Number of Respondents	520
Total Estimated Burden Hours	24,500
Total Estimated Costs	\$1,550,000
Annualized Capital O&M	\$0
Total Annual Responses	161
Form Number	Not Applicable

Table 1: Annual Respondent Burden and Cost – National Volatile Organic Compound Emission

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
1. Applications	N/A			
2. Surveys and Studies	N/A			
3. Reporting Requirements				
A. Read Instructions ^c	2	1	2	5
B. Gathering Existing Information	See 3C			
C. Write Report				
Initial Report ^c	2	1	2	5
Date Code Explanation ^c	1	1	1	5
Update Date Codes ^d	2	1	2	52
Recycled Coatings Report - Mass Balance ^e	6	1	6	13
Recycled Coatings Report - Formulation ^e	4	1	4	13
Exceedance Fee Annual Report ^f	8	1	8	47
Tonnage Exemption Annual Report ^g	8	1	8	78
Subtotal for Reporting Requirements				
4. Recordkeeping Requirements				
A. Read Instructions	See 3A			
B. Plan Activities ^{a,c}	8	1	8	5
C. Implement Activities				
Calculate VOC content for Each Product ^{c,h}	42	1	42	5
Calculate Adjusted VOC for Recycled Coatings ⁱ	20	1	20	26
Exceedance Fee - Calculations ^f	64	1	64	47
Tonnage Exemption Calculations ^g	16	1	16	78
D. Record Data				
Recycling Volumes ⁱ	8	12	96	26
Exceedance Fee ^f	8	1	8	47
Tonnage Exemption ^g	4	1	4	78
E. Time to Train Personnel	N/A			
5. Labeling ^{j,k}	67	1	67	87
Subtotal for Recordkeeping Requirements				
Total Labor Burden and Costs (rounded) ^l				
Total Capital and O&M Cost (rounded) ^l				
GRAND TOTAL (rounded) ^l				

Assumptions:

^a The respondent universe consists of 520 architectural coating manufacturers. Of these, 78 are considered small manufacturers. that the number of new respondents submitting the one-time Initial Notification ^l of the total respondent universe of 520, or about 5 per year.

^b This ICR uses the following labor rates: \$163.17 ($\$77.70 + 110\%$) per hour for Executive, Administrative, and Professional labor, \$110.29 ($\$52.50 + 110\%$) per hour for Technical labor, and \$65.71 ($\$31.29 + 110\%$) per hour for Clerical labor. These rates are based on the Bureau of Labor Statistics, September 2022, "Table 2. Civilian workers by occupational and industry wage rates and compensation." The rates have been increased by 110 percent to account for varying industry wage rates and to account for the cost of employing workers beyond their wages and benefits, including business expenses associated with hiring.

^c Total number of manufacturers is estimated to be 520; 1 percent or 5 new respondents per year are assumed.

^d Assumed that 10 percent of manufacturers update some date codes each year. (520 manufacturers) (0.10) = 52 manufacturers.

^e Assumed that 5 percent of manufacturers recycle coatings (520 manufacturers) (0.05) = 26 manufacturers. It is assumed that 50 percent of these 26 manufacturers would demonstrate compliance using mass balance and the other half using other methods.

^f Based on exceedance fee reports received in 2009 (52) and 2010 (39), it is estimated that 47 exceedances occur each year.

^g Assumed that 78 manufacturers will use the tonnage exemption option.

^h Based on a time estimate of 1 hour per coating product. (1 hour/product) (42 products/manufacturer) = 42 hours/manufacturer.

ⁱ Assumed that 5 percent of manufacturers recycle coatings. (520 manufacturers) (0.05) = 26 manufacturers.

^j Based on an industry estimate of 320 hours needed to modify labels for a company with 200 paint products. (320 hours/200 products/manufacturer) = 1.6 hours/manufacturer. (1.6 hours/manufacturer) (42 products/manufacturer) = 67 hours/manufacturer.

^k Assumed that half of the manufacturers would have to modify their labels over 3 years. (520 manufacturers) (0.5) = 260 manufacturers.

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

Standards for Architectural Coatings (40 CFR Part 59, Subpart D)

(E) Technical person- hours per year (E=CxD)	(F) Management person hours per year (Ex0.05)	(G) Clerical person hours per year (Ex0.1)	(H) Cost, \$ ^b
10	5	1	\$2,184
10	5	1	\$2,184
5	2.5	0.5	\$1,092
104	52	10.4	\$22,717
78	39	7.8	\$17,038
52	26	5.2	\$11,359
376	188	37.6	\$82,132
624	312	62.4	\$136,304
2,014			\$275,011
40	20	4	\$8,737
210	105	21	\$45,872
520	260	52	\$113,587
3008	1504	300.8	\$657,055
1248	624	124.8	\$272,608
2496	1248	249.6	\$545,216
376	188	37.6	\$82,132
312	156	31.2	\$68,152
5829	2914.5	582.9	\$1,273,263
22,462			\$3,066,623
24,500			\$1,550,000
			\$0
			\$1,550,000

Labor Rates	
Management	\$163.17
Technical	\$130.28
Clerical	\$65.71

152 hr/response

ered large manufacturers and 442 are considered
Report and date code explanations will be 1 percent

ative, and Managerial labor; \$130.28 (\$62.04 +
ates are from the United States Department of
dustry group.” The rates are from column 1, “Total
tes and the additional overhead business costs of
ng, training, and equipping their employees.

ssumed.

.10) = 52 manufacturers.

urers. Of the 26 manufacturers, assumed half of the
sing formulations.

nce fee reports will be submitted per year.

= 42 hours/manufacturer.

turers.

oducts, or 1.6 hours per product. (1.6 hours/product)

cturers) (0.5)/(3 years) = 87 manufacturers per year.

Table 2: Average Annual EPA Burden and Cost – National Volatile Organic Compound En

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
Initial Report ^c	1	5	5	5
Annual Report: Manufacture of Recycled Coatings - Mass Balance ^d	1	12.5	12.5	26
Annual Report: Manufacture of Recycled Coatings - Formulation ^d	0.5	12.5	6.3	26
Date Code				
Date Code Reports ^c	0.5	5	2.5	5
Date Code Updates ^e	0.5	50	25	52
Annual Report: Exceedance Fee ^f	4	45	180	47
Annual Report: Tonnage Exemption ^g	2	75	150	78
Maintenance of implementation database	60	1	60	1
TOTAL (rounded) ^h				

Assumptions:

^a The respondent universe consists of 520 architectural coating manufacturers. Of these, 78 are considered manufacturers. that the number of new respondents submitting the one-time Initial Notification Report and respondent universe of 520, or about 5 per year.

^b The cost is based on the following labor rate which incorporates a 1.6 benefits multiplication factor to ac rates of \$73.46 (GS-13, Step 5, \$45.91 + 60%), Technical rate of \$54.51 (GS-12, Step 1, \$34.07 + 60%), a These rates are from the Office of Personnel Management (OPM), 2023 General Schedule, which exclude 60 percent to account for the benefit packages available to government employees.

^c Total number of manufacturers is estimated to be 520; 1 percent or 5 new respondents per year are assur

^d Assumed 26 recycled coating manufacturers; assumed half use mass balance option and half use formula

^e Assumed 10 percent of all manufacturers update some date codes each year. (520 manufacturers) (0.10) :

^f Assumed 47 manufacturers will pay fees on some coatings (see footnote f in Table 1).

^g Assumed 78 manufacturers will use tonnage exemption option.

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

ission Standards for Architectural Coatings (40 CFR Part 59, Subpart D)

(E) Technical person- hours per year (E=CxD)	(F) Management person hours per year (Ex0.05)	(G) Clerical person hours per year (Ex0.1)	(H) Cost, \$ ^b
25	0.25	0.5	\$1,395.92
325	0.625	1.25	\$17,799.19
163.8	0.315	0.63	\$8,970.79
12.5	0.125	0.25	\$697.96
1,300	1.25	2.5	\$71,031.18
8,460	9	18	\$462,363.70
11,700	7.5	15	\$638,783.88
60	3	6	\$3,668.11
22,100			\$1,205,000

Labor Rates	
Management	\$73.46
Technical	\$54.51
Clerical	\$29.50

large manufacturers and 442 are considered small
 and date code explanations will be 1 percent of the total

count for government overhead expenses. Managerial
 and Clerical rate of \$29.50 (GS-6, Step 3, \$18.44 + 60%).
 s locality, rates of pay. The rates have been increased by

red.

tion option.

= 52 manufacturers.

0.05 26
 52

There are no Capital and O&M costs associated with this ICR Renewal

Total Annual Responses

(A)	(B)	(C)	(D)
Information Collection Activity	Number of Respondents ^a	Number of Responses	Number of Existing Respondents That Keep Records But Do Not Submit Reports
Initial Notification	5	1	0
Initial Report	5	1	0
Annual report for manufacturers and importers of recycled coatings that choose to determine the adjusted VOC content	26	1	0
Annual report for manufacturers and importers using the optional exceedance fee	47	1	0
Annual report for manufacturers and importers using the optional tonnage exemption	78	1	0
			Total

(E)
Total Annual Responses $E=(B \times C)+D$
5
5
26
47
78
161

Number of Respondents				
	Respondents That Submit Reports		Respondents That Do Not Submit Any Reports	
	(A)	(B)	(C)	(D)
Year	Number of New Respondents ^a	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
1	5	510	0	0
2	5	515	0	0
3	5	520	0	0
Average	5	515	0	0

^a New respondents include sources with constructed, reconstructed, and modified affected facilities.

(E)
Number of Respondents (E=A+B+C-D)
515
520
525
520