

ICR Summary Information

Hours per Response	256
Number of Respondents	56
Total Estimated Burden Hours	28,700
Total Estimated Costs	\$3,390,000
Annualized Capital O&M	\$0
Form Number	Not Applicable

Table 1a: Annual Respondent Burden and Cost – NESHAP for Shipbuilding and Ship Repair F

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. Survey and Studies	N/A			
3. Reporting Requirements				
a. Familiarization with Regulatory Requirements	1	1	1	50
b. Required Activities	See 3e			
c. Create Information	See 3e			
d. Gather Existing Information	See 3e			
e. Write Report				
Notification of Construction/Reconstruction ^c	2	1	2	0
Notification of Demonstration of CMS ^c	N/A			
Report of Performance Test ^c	N/A			
Initial Notification and Implementation ^c	14	1	14	0
Semiannual Notification of Compliance Status	8	2	16	50
Subtotal for Reporting Requirements				
4. Recordkeeping Requirements				
a. Familiarization with Regulatory Requirements	See 3e			
b. Plan Activities	N/A			
c. Implement Activities	8	50	400	50
d. Develop Record System ^c	8	1	8	0
e. Train Personnel	28	1	28	50
g. Audits	N/A			
Subtotal for Recordkeeping Requirements				
Total Labor Burden and Costs (rounded) ^d				
Total Capital and O&M Cost (rounded) ^d				
GRAND TOTAL (rounded) ^d				

Assumptions:

^a Number of affected facilities per year is 56. We assume 90 percent of sources are in the private sector, or approximately growth over the three-year period of this ICR. We assume that each respondent will have to familiarize with the regulatory

^b This ICR uses the following labor rates: Managerial \$163.17 (\$77.70 + 110%); Technical \$130.28 (\$62.04 + 110%); and United States Department of Labor, Bureau of Labor Statistics, September 2022, “Table 2. Civilian Workers, by occupational compensation.” The rates have been increased by 110 percent to account for varying industry wage rates and the additional wages and benefits, including business expenses associated with hiring, training, and equipping their employees.

^c We have assumed this is a one-time-only cost.

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

activities - Surface Coating (40 CFR Part 63, Subpart II) (Renewal) (Private Se

(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
50	2.5	5	\$7,250.48
0	0	0	\$0
0	0	0	\$0
800	40	80	\$116,007.60
978			\$123,258.08
20000	1000	2000	\$2,900,190.00
0	0	0	\$0
1400	70	140	\$203,013.30
24,610			\$3,103,203
25,600			\$3,230,000
			\$0
			\$3,230,000

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

50 respondents. We have assumed that there will be no new requirements each year.

1 Clerical \$65.71 (\$31.29 + 110%). These rates are from the "Total overhead business costs of employing workers beyond their normal and industry group." The rates are from column 1, "Total

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Table 1b: Annual Respondent Burden and Cost – NESHAP for Shipbuilding and Ship Repair F

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. Survey and Studies	N/A			
3. Reporting Requirements				
a. Familiarization with Regulatory Requirements	1	1	1	6
b. Required Activities	See 3e			
c. Create Information	See 3e			
d. Gather Existing Information	See 3e			
e. Write Report				
Notification of Construction/Reconstruction ^c	2	1	2	0
Notification of Demonstration of CMS ^c	N/A			
Report of Performance Test ^c	N/A			
Initial Notification and Implementation ^c	14	1	14	0
Semiannual Notification of Compliance Status	8	2	16	6
Subtotal for Reporting Requirements				
4. Recordkeeping Requirements				
a. Familiarization with Regulatory Requirements	See 3e			
b. Plan Activities	N/A			
c. Implement Activities	8	50	400	6
d. Develop Record System ^c	8	1	8	0
e. Train Personnel	28	1	28	6
g. Audits	N/A			
Subtotal for Recordkeeping Requirements				
Total Labor Burden and Costs (rounded) ^d				
Total Capital and O&M Cost (rounded) ^d				
GRAND TOTAL (rounded) ^d				

Assumptions:

^a Number of affected facilities per year is 56. We assume 10 percent of sources are in the public sector, or approximately 6 growth over the three-year period of this ICR. We assume that each respondent will have to familiarize with the regulatory

^b This cost is based on the average hourly labor rate as follows: Managerial \$73.46 (GS-13, Step 5, \$45.91 + 60%); Techn \$29.50 (GS-6, Step 3, \$18.44 + 60%). This ICR assumes that Managerial hours are 5 percent of Technical hours, and Cler from the Office of Personnel Management (OPM), 2023 General Schedule, which excludes locality, rates of pay. The rates packages available to government employees.

^c We have assumed this is a one-time-only cost.

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

activities - Surface Coating (40 CFR Part 63, Subpart II) (Renewal) (Public Sec

(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
6	0.3	0.6	\$366.80
0	0	0	\$0
0	0	0	\$0
96	4.8	10	\$5,868.77
117			\$6,235.57
2400	120	240	\$146,719.20
0	0	0	\$0
168	8.4	16.8	\$10,270.34
2,953			\$156,990
3,070			\$163,000
			\$0
			\$163,000

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

5 respondents. We have assumed that there will be no new requirements each year.

ical \$54.51 (GS-12, Step 1, \$34.07 + 60%); and Clerical hours are 10 percent of Technical hours. These rates are s have been increased by 60 percent to account for the benefit

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Table 1c: Annual Respondent Burden and Cost Breakdown by Affected Sector – NESHAP for Shipb

Affected Sector	Number of Responses	Labor Hours			Labor Cost
		Reporting	Recordkeeping	Total	
Private	50	978	24,610	25,600	\$3,230,000
Public (Federal)	6	117	2,953	3,070	\$163,000
Total ^a	56	1,090	27,600	28,700	\$3,390,000

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

uilding and Ship Repair Facilities - Surface Coating (40 CFR Part 63, Subpart II) (Renewal)

Capital and O&M Cost
\$0
\$0
<i>\$0</i>

256 hr/response

Table 2: Average Annual EPA Burden and Cost – NESHAP for Shipbuilding and Ship Repair Facilities

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 Performance Tests ^c	N/A			
Repeat Performance Test	N/A			
Report Review				
Notification of Construction ^c	2	1	2	0
Review of Initial Notification and Implementation Plan ^c	2	1	2	0
Review of Semiannual Notification of Compliance Status	2	2	4	56
TOTAL (rounded) ^d				

Assumptions:

^a Number of affected facilities per year is 56.

^b This cost is based on the average hourly labor rate as follows: Managerial \$73.46 (GS-13, Step 5, \$45.91 + 60%); Technical \$31.44 (GS-6, Step 3, \$18.44 + 60%). This ICR assumes that Managerial hours are 5 percent of Technical hours, and Clerical hours are 1 percent of Technical hours. Rates are from the Office of Personnel Management (OPM), 2023 General Schedule, which excludes locality, rates of pay. The rates have been available to government employees.

^c We have assumed this is a one-time-only cost.

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

ilities - Surface Coating (40 CFR Part 63, Subpart II) (Renewal)

(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
0	0	0	\$0.00
0	0	0	\$0.00
224	11.2	22.4	\$13,693.79
258			\$13,700

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

al \$54.51 (GS-12, Step 1, \$34.07 + 60%); and Clerical \$29.50 are 10 percent of Technical hours. These rates are from the increased by 60 percent to account for the benefit packages

The only type of industry costs associated with the information collection activity in the regulations are labor

· costs. There are no capital/startup or operation and maintenance costs.

Total Annual Responses				
(A)	(B)	(C)	(D)	(E)
Information Collection Activity	Number of Respondents ^a	Number of Responses	Number of Existing Respondents That Keep Records But Do Not Submit Reports	Total Annual Responses $E=(B \times C)+D$
Semiannual Report/Notification	56	2	0	112
			Total	112

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	0	56	0	0
2	0	56	0	0
3	0	56	0	0
Average	0	56	0	0

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

(E)
Number of Respondents (E=A+B+C-D)
56
56
56
56