ICR Summary Information	
Hours per Response	155
Number of Respondents	48
Total Estimated Burden Hours	16,200
Total Estimated Costs	$2,220,000
Annualized Capital O&M	$166,000
Form Number	5900-0526

Table 1: Annual Respondent Burden and Cost - NESHAP for Metal Coil Surface Coating Plant

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 the regulatory requirements [a]	4	1	4	48
B. Required activities				
Initial oxidizer performance test [c]	30	0.07	2.1	0
Repeat oxidizer performance test [c]	30	0.07	2.1	0
Initial capture performance test, or review design criteria to ensure capture system meets design criteria for a permanent total enclsosure (PTE) [c, d]	8	0.07	0.56	0
Repeat capture performance test [c, d]	8	0.07	0.56	0
Add-on control performance test [e]	30	1	30	4.2
Repeat add-on control performance test [f]	30	1	30	0.21
Emission rate limit compliance determination	16	12	192	0
Startup, shutdown, malfunction plan	32	1	32	0
C. Create information	See 4B			
D. Gather existing information [g]	60	1	60	48
E. Write Report				
Initial notification	2	1	2	0
Notification of construction/reconstruction	2	1	2	0
Notification of actual startup	2	1	2	0
Notification of compliance status	4	1	4	0
Performance test notification [e, f]	2	1	2	4.41
Performance test report [e , f]	10	1	10	4.41
Semiannual report of exceedances [h]	16	2	32	5
Semiannual report of no exceedances [i, j]	8	2	16	43
Startup, shutdown, malfunction report [k]	8	2	16	0
Subtotal for Reporting Requirements				
2. Recordkeeping requirements				
4. Recordkeeping requirements				
A. Familiarization with the regulatory requirements	See 4B			
B. Plan activities	N/A			
C. Implement Activities	N/A			
D. Develop record system	N/A			
E. Revise record systems due to SSM revisions [l]	8	1	8	0
F. Become familiar with CEDRI for electronic filing of notifications and reports [m]	8	1	8	0
G. Time to enter records of all information required by standards [n]	4	52	208	48
H. Time to train personnel	N/A			

I. Time to adjust existing ways to comply with previously applicable requirements	N/A			
J. Time to transmit or disclose information [o]	0.25	2	0.5	48
K. Time for audits	N/A			
Subtotal for Recordkeeping Requirements				
Total Labor Burden and Cost (rounded) [p]				
Total Capital and O&M Cost (rounded) [p]				
GRAND TOTAL (rounded) [p]				

Assumptions:

[a] We have assumed that there are approximately 48 respondents, with no additional new or reconstructed sources becomir assumes each respondent will incur a burden to re-familiarize themselves with the regulatory requirements each year.

[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, January 2023, "Table 2. Civilian Workers, by occupationa compensation." The rates have been increased by 110 percent to account for the benefit packages available to those emplo

[c] This is a one-time startup cost associated with initial compliance determination and acquisition, installation, and utilizati recordkeeping and reporting. The one-time startup costs were annualized over the 15-year life of control equipment at 7 p year is annualized over the 15 year life of the control equipment. Because there are no new sources, no performance tests a contract out the performance testing costs, but some labor hours from facility staff would be involved with coordinating ar

[d] We have assumed that emission capture systems meet the design criteria for a permanent total enclosure in EPA Method

[e] Facilities that comply using emission capture systems and add-on controls conduct air emissions performance testing, w Labor totals include hours for the facility to obtain the testing contractor, plan and attend the test, review the test report, an sources subject to Subpart SSSS, 30 add on control devices at 21 sources do not already have a permit testing requirement five years (21 sources/5 years = 4.2 sources per year).

[f] It is assumed that 5 percent of respondents will have to repeat performance tests. (4.2 x 0.05 = 0.21 per year)

[g] Based on comments we received from industry consultation, 60 hrs per respondent is required to gather and evaluate info

[h] We have assumed that exceedances are reported semiannually. We have assumed that 10 percent of respondents will rep rounded).

[i] Reports indicating no exceedances are required semiannually.

[j] We have assumed that 90 percent of respondents will report no exceedances (48 x 0.9 = 43.2, or 43 respondents, when rc

[k] We have assumed that 10 percent of respondents will file a startup, shutdown, malfunction report semiannually (48 x 0.1 not applicable on and after August 24, 2020.

[l] We assume that costs associated with elimination of the SSM exemption include time for re-evaluating previously develc with the use of electronic reporting and include time to become familiar with CEDRI and the semi-annual reporting form.

[m] Responses in year one associated with the use of electronic reporting include becoming familiar with CEDRI and the se

[n] We have assumed that all information is entered on a weekly basis.

[o] We have assumed that each of the 48 respondents will take 15 minutes to transmit or disclose information twice a year.

[p] Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

ts (40 CFR Part 63, Subpart SSSS) (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]
192	9.6	19.2	$27,846.05
0	0	0	$0.00
0	0	0	$0.00
0	0	0	$0.00
0	0	0	$0.00
126	6.3	12.6	$18,273.97
6	0	1	$913.70
0	0	0	$0.00
0	0	0.0	$0.00
2880	144	288.0	$417,690.72
0	0	0.0	$0.00
0	0	0.0	$0.00
0	0	0.0	$0.00
0	0	0.0	$0.00
9	0.441	0.9	$1,279.18
44	2.205	4.4	$6,395.89
160	8	16.0	$23,205.04
688	34.4	68.8	$99,781.67
0	0	0.0	$0.00
4,721			***$595,386***
0	0	0	$0.00
0	0	0	$0.00
9984	499.2	998.4	$1,447,994.50

Labor Rates	
Management	$163.61
Technical	$130.28
Clerical	$65.71

24	1.2	2.4	$3,480.76
11,509			***$1,451,475***
16,200			***$2,050,000***
			$166,000
			$2,220,000

155 hr/respons

ıg subject to the rule over the next three years. This ICR

l Clerical $65.71 ($31.29 + 110%). These rates are from the
l and industry group." The rates are from column 1, "Total
›yed by private industry.

ion of technology and systems needed to support
ercent interest. The number of occurrences per respondent per
ıre expected to occur. It is assumed that the facility would
ıd observing the test and reviewing the results.
204, so that capture efficiency does not need to be measured.

ithin 3 years of the effective date of the revised standards.
ıd load it to ERT. A permit review revealed that, of the 48
. 21 sources undergo testing of their control devices once every

rmation in preparation of semiannual reports.
ort exceedances (48 x 0.1 = 4.8, or 5 respondents, when

›unded).
l = 4.8, or 5 respondents, when rounded). This requirement is

›ped SSM record systems in year one. Costs are also associated

mi-annual reporting form.

se

Table 2: Average Annual EPA Burden and Cost - NESHAP for Metal Coil Surface Coating 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]
Initial performance test [a]	48	0	0	0
Repeat performance test-retesting preparation	4	0	0	0
Repeat performance-retesting	48	0	0	0
Excess emissions enforcement activities	120	1	120	0
Review reports				
Notification of applicability	2	1	2	0
Notification of construction/reconstruction	2	1	2	0
Notification of actual startup	2	1	2	0
Notification of special compliance requirements	N/A			
Notification of compliance status	2	1	2	0
Notification of peformance test [c]	4	1	4	4.41
Review of initial performance test report [d]	8	1	8	4.2
Review of repeat performance test report [d]	8	1	8	0.21
Semiannual report of excess emissions [e, f]	8	2	16	5
Semiannual report of no excess emissions [g, h]	2	2	4	43
Review of NESHAP waiver application	N/A			
Review startup, shutdown, malfunction report [i]	2	2	4	0
Review record systems due to SSM revisions [j]	2	2	4	0
TOTAL (rounded) [h]				

Assumptions:

[a] We have assumed that there are approximately 48 respondents, with no additional new or reconstructed sources becor assumes each respondent will incur a burden to re-familiarize themselves with the regulatory requirements each year.

[b] This cost is based on the average hourly labor rate as follows: Managerial $73.46 (GS-13, Step 5, $44.91 + 60%); Tec $29.50 (GS-6, Step 3, $18.44 + 60%). These rates are from the Office of Personnel Management (OPM), 2023 General been increased by 60 percent to account for the benefit packages available to government employees.

[c] It is assumed that it will take four hours to review the notification of the test and the test plan for each respondent.

[d] Facilities that comply using emission capture systems and add-on controls conduct air emissions performance testing, facilities utilize 30 add-on VOC/HAP control devices and would require testing once every five years (21 sources/5 yea respondents will have to repeat performance tests. (4.2 x 0.05 = 0.21 per year)

[e] It is assumed that 10 percent of respondents will report excess emissions (48 x 0.1 = 4.8, or 5 respondents, when roun

[f] It is assumed that reports of excess emissions are required semiannually.

[g] We have assumed that 90 percent of respondents will report no excess emissions (48 x 0.9 = 43.2, or 43 respondents,

[h] It is assumed that reports of no excess emissions are required semiannually.

[i] We have assumed that 10 percent of respondents will submit startup, shutdown, malfunction reports to be reviewed (4 requirement is not applicable on and after August 24, 2020.

[j] These are costs associated with evaluating new SSM record systems in year one of the 2020 rule amendments.

[k] Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

lants (40 CFR Part 63, Subpart SSSS) (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
0	0	0	$0
0	0	0	$0
0	0	0	$0
0	0	0	$0
0	0	0	$0
0	0	0	$0
0	0	0	$0
17.64	0.882	1.764	$1,078
33.6	1.68	3.36	$2,054
1.68	0.084	0.168	$103
80	4	8	$4,891
172	8.6	17.2	$10,515
0	0	0	$0
0	0	0	$0
351			**$18,600**

Labor Rates	
Management	$73.46
Technical	$54.51
Clerical	$29.50

ming subject to the rule over the next three years. This ICR

chnical $54.51 (GS-12, Step 1, $34.07 + 60%); and Clerical
Schedule, which excludes locality rates of pay. The rates have

within 3 years of the effective date of the revised standards. 21
rs = 4.2 sources per year). It is assumed that 5 percent of

ded).

when rounded).

48 x 0.1 = 4.8, or 5 respondents, when rounded). This

Capital/Startup vs. Operation and Maintenanc			
(A)	**(B)**	**(C)**	**(D)**
Continuous Monitoring Device	**Capital/Startup Cost for One Respondent**	**Number of Respondents**	**Total Capital/Startup Cost, (B X C)**
Continuous temperature monitor [a]	$0	0	$0
Performance Test [b]	$18,750 / $14,063	4.41	$108,001
Total [c]			**$108,000**

[a] The O&M cost to maintain continuous temperature measuring monitor is $1,200 per respondent. The cos

[b] Emissions compliance testing costs are treated as capital costs because facilities routinely contract with a assumed to be associated with the periodic testing requirement. Assumes nine sources test two control dev one control device each at a cost of $18,750 once every five years. Five percent of tests will be repeated at estimate average capital cost per year.

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

ce (O&M) Costs

(E)	(F)	(G)
Annual O&M Costs for One Respondent	**Number of Respondents with O&M**	**Total O&M, (E X F)**
$1,200	48	$57,600
$0	0	$0
		$57,600

$166,000

st covers replacement of temperature sensor each calendar year.

testing company to perform the testing. No O&M costs would be
ices each at a cost of $32,813 once every five years. Twelve sources test
a cost of $18,750 each. Total test costs are divided by five years to

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	48	0	0
2	0	48	0	0
3	0	48	0	0
Average	0	48	0	0

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

(E)
Number of Respondents (E=A+B+C-D)
48
48
48
48

Total Annual Responses				
(A)	(B)	(C)	(D)	(E)
Information Collection Activity	Number of Respondents	Number of Responses	Number of Existing Respondents That Keep Records But Do Not Submit Reports	Total Annual Responses E=(BxC)+D
Initial notification	0	1	0	0
Notification of construction/reconstruction	0	1	0	0
Notification of actual startup	0	1	0	0
Notification of compliance status	0	1	0	0
Performance test notification	4.41	1	0	4.41
Performance test report	4.41	1	0	4.41
Semiannual report of exceedances	5	2	0	10
Semiannual report of no exceedances	43	2	0	86
Startup, shutdown, malfunction report	0	2	0	0
			Total	**105**