

ICR Summary Information

Hours per Respondent	95
Number of Respondents	5
Total Estimated Burden Hours	1,940
Total Estimated Costs	\$282,000
Annualized Capital O&M	\$15,400
Form Number	

<- Note to EPA: Please provide form number

Table 1: Annual Respondent Burden and Cost - NESHAP for Surface Coating of Metal Cans (

Burden item	(A)	(B)	(C)
	Person hours per occurrence	No. of occurrences per respondent per year	Person hours per respondent per year (C=AxB)
1. Reporting Requirements			
a. Familiarization with the regulatory requirements	4	1	4
b. Compile and process data	4	4	16
c. Write reports			
i. Initial notification	2	1	2
ii. Notification of compliance status	2	1	2
iii. Notification of construction/reconstruction	2	1	2
iv. Notification of actual startup	2	1	2
v. Notification of performance test ^c	2	1	2
vi. Report of performance test ^c	10	1	10
vii. Semiannual report	6	2	12
viii. Excess emissions report	2	2	4
ix. Startup, shutdown, malfunction report ^d	2	1	2
x. Add-on control performance test ^e	30	1	30
Subtotal for Reporting Requirements			
2. Recordkeeping requirements			
a. Familiarization with the regulatory requirements	4	1	4
b. Plan activities	12	1	12
c. Implement activities	12	1	12
d. Maintain record system for material used	20	1	20
e. Revise record systems due to SSM revisions ^f	8	1	8
f. Time to enter information			
i. Material usage	0.5	365	182.5
ii. Compliance calculation	2	12	24
g. Time to train personnel	10	1	10
h. Store, file, and maintain records	2	12	24
i. Retrieve records/reports	1	12	12
Subtotal for Recordkeeping Requirements			
TOTAL LABOR BURDEN AND COST (rounded) ^g			
Total CAPITAL and O&M COST (rounded) ^g			
GRAND TOTAL (rounded) ^g			

Assumptions:

^a We have assumed that the average number of respondents that will be subject to the rule will be 5 existing sources. Th

- ^b This ICR uses the following labor rates: Managerial \$172.41 (\$82.10+ 110%); Technical \$141.75 (\$67.50 + 110%); and Labor, Bureau of Labor Statistics, December 2023, “Table 2. Civilian workers by occupational and industry group.” The account for varying industry wage rates and the additional overhead business costs of employing workers beyond their w equipping their employees.
- ^c We have assumed that one facility will be required to conduct testing not already required by their Part 70 permit once
- ^d Previous ICR assumed 25 percent of facilities use add-on controls and submit startup, shutdown, malfunction (SSM) r
- ^e Facilities that comply using emission capture systems and add-on controls are required to conduct air emissions perform include hours for the facility to obtain the testing contractor, plan and attend the test, review the test report, and load it to testing by the facility's state-issued permit. The final RTR amendments will require this facility to do performance testing
- ^f We assume no facilities will need to revise their record systems due to SSM revisions from the 2020 amendments.
- ^g Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

(40 CFR Part 63, Subpart KKKK) (Renewal)

(D)	(E)	(F)	(G)	(H)
Respondents per year ^a	Technical person- hours per year (E=CxD)	Management person hours per year (Ex0.05)	Clerical person hours per year (Ex0.1)	Total Cost Per year ^b
5	20	1	2	\$3,150
5	80	4	8	\$12,601
	0	0	0	\$0
0	0	0	0	\$0
0	0	0	0	\$0
0	0	0	0	\$0
0	0	0	0	\$0
0.2	0.4	0.02	0.04	\$63
0.2	2	0.1	0.2	\$315
5	60	3	6	\$9,450
5	20	1	2	\$3,150
0	0	0	0	\$0
0.2	6	0.3	0.6	\$945.04
	217			\$29,674
5	20	1	2	\$3,150
5	60	3	6	\$9,450
5	60	3	6	\$9,450
5	100	5	10	\$15,751
0	0	0	0	\$0
5	912.5	45.625	91.25	\$143,725
5	120	6	12	\$18,901
5	50	2.5	5	\$7,875
5	120	6	12	\$18,901
5	60	3	6	\$9,450
	1,728			\$236,654
	1,940			\$266,300
	1,940			\$15,400
	1,940			\$282,000

Labor]
\$172.41
\$141.75
\$71.36

hrs/respor

ere will be no additional sources over the three-year period of this ICR.

d Clerical \$71.36 (\$33.98 + 110%). These rates are from the United States Department of rates are from column 1, "Total compensation." The rates are increased by 110 percent to ages and benefits, including business expenses associated with hiring, training, and

every 5 years (1 facility / 5 years = 0.2 facility per year).

ports once per year. The 2020 rule amendment eliminated the SSM report requirement.

nance testing, within 3 years of the effective date of the revised standards. Labor totals ERT. One facility has three add-on controls and is not already required to perform periodic every five years.

Rates
Managerial
Technical
Clerical

Table 2: Average Annual EPA Burden and Cost - NESHAP for Surface Coating of Metal

Activity	(A)	(B)	(C)
	EPA person-hours per occurrence	No. of occurrences per plant per year	EPA person-hours per plant per year (C=AxB)
1. Initial performance test	24	1	24
2. Repeat performance test	24	1	24
3. Report review			
a. Initial notification	8	1	8
b. Notification of performance test ^c	8	1	8
c. Notification of compliance status	8	1	8
d. Notification of construction/reconstruction	8	1	8
e. Notification of actual startup	8	1	8
f. Report of performance test ^d	8	1	8
g. Semiannual report	12	2	24
h. Excess emissions report	4	2	8
i. Startup, shutdown, report ^e	8	1	8
j. Review record systems due to SSM revisions ^f	2	2	4
TOTAL (rounded) ^g			

Assumptions:

- ^a We have assumed that the average number of respondents that will be subject to the rule will be 5 existing sources.
- ^b This cost is based on the average hourly labor rate as follows: Managerial \$76.91 (GS-13, Step 5, \$48.07 + 60% + 60%). This ICR assumes that Managerial hours are 5 percent of Technical hours, and Clerical hours are 10 percent of General Schedule, which excludes locality, rates of pay. The rates have been increased by 60 percent to account for inflation.
- ^c We have assumed that it will take four hours to review the notification of the test and the test plan for each respondent required by their Part 70 permit once every 5 years (1 facility / 5 years = 0.2 facility per year).
- ^d We have assumed that it will take eight hours to review the test report for each respondent.
- ^e The 2020 rule amendment eliminated the SSM report requirement.
- ^f We assume no record systems will need to be revised during the 3-year period of this ICR due to SSM revisions.
- ^g Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

Plans (40 CFR Part 63, Subpart KKKK) (Renewal)

(D)	(E)	(F)	(G)	(H)
Plants per year ^a	Technical person-hours per year (E=CxD)	Management person-hours per year (Ex0.05)	Clerical person-hours per year (Ex0.1)	Cost, \$ ^b
0	0	0	0	\$0
0	0	0	0	\$0
0	0	0	0	\$0
0.2	1.6	0.08	0.16	\$102
0	0	0	0	\$0
0	0	0	0	\$0
0	0	0	0	\$0
0.2	1.6	0.08	0.16	\$102
5	120	6	12	\$7,681
5	40	2	4	\$2,560
0	0	0	0	\$0
0	0	0	0	\$0
		188		\$10,400

Lab
\$76.91
\$57.07
\$30.88

es. There will be no additional sources over the three-year period of this ICR.

); Technical \$57.07 (GS-12, Step 1, \$35.67 + 60%); and Clerical \$30.88 (GS-6, Step 3, \$19.30+
t of Technical hours. These rates are from the Office of Personnel Management (OPM), 2024
r the benefit packages available to government employees.

ndent. We have further assumed that one facility will be required to conduct testing not already

from the 2020 amendments.

or Rates
Managerial
Technical
Clerical

Capital/Startup vs. Operation and Maintenance			
(A)	(B)	(C)	(D)
Continuous Monitoring Device	Capital/Startup Cost for One Respondent	Number of New Respondents	Total Capital/Startup Cost, (B X C)
Testing ^a	\$18,750 / \$14,063	0.2	\$9,375
CPMS ^b	\$16,000	0	\$0
Totals (rounded)^c			\$9,380

^a We assume three add-on control devices at one facility will be required to conduct periodic performance test assume that all three devices will be tested during one visit by a testing company. EPA assumes that the cost of Assuming the cost for testing one control device is \$18,750, the cost for testing three control devices at one si

^b CMPS is required for complying with operating limits such as RTO temperature monitoring.

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

(O&M) Costs

(E)	(F)	(G)
Annual O&M Costs for One Respondent	Number of Respondents with O&M	Total O&M, (E X F)
\$0	0	\$0
\$1,200	5	\$6,000
		\$6,000

\$15,400

ing once every five years (1 facility / 5 years = 0.2 facility per year). We of testing is 25% less for the second unit and subsequent units at one site. ite is \$18,750 + \$14,063 + \$14,063 = \$46,876.

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=(BxC)+D
Initial notification	0	1	0	0
Notification of compliance status	0	1	0	0
Notification of construction/reconstruction	0	1	0	0
Notification of actual startup	0	1	0	0
Notification of performance test	0.2	1	0	0.2
Report of performance test	0.2	1	0	0.2
Semiannual report	5	2	0	10
Excess emissions report	5	2	0	10
Startup, shutdown, malfunction report	0	1	0	0
			Total (rounded)	20

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

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	5	0	0
2	0	5	0	0
3	0	5	0	0
Average	0	5	0	0

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

(E)
Number of Respondents (E=A+B+C-D)
5
5
5
5