

### **ICR Summary Information**

Hours Per Response	22
Number of Respondents	2900
Total Estimated Burden Hours	67,700
Total Estimated Costs	\$9,270,000
Annualized Capital O&M	Not Applicable
Form Number	Not Applicable

**Table 1: Annual Respondent Burden and Cost - NESHAP for Plating and Polishing Operation**

Burden item	(A)	(B)	(C)	(D)
	Person hours per occurrence	No. of occurrences per respondent per year	Person hours per respondent per year (C=AxB)	Respondents per year <sup>a</sup>
1. Applications	N/A			
2. Surveys and Studies	N/A			
3. Acquisition, Installation, and Utilization of Technology and Systems	N/A			
4. Reporting Requirements				
A. Familiarization with Regulatory Requirements <sup>c</sup>	1	1	1	2,900
B. Required activities				
Initial Notification of applicability <sup>d</sup>	2	1	2	0
Notification of Compliance Status <sup>e</sup>	4	1	4	0
Annual Compliance Certification <sup>f</sup>	2	1	2	2,900
Annual Report of Deviations <sup>g</sup>	2	1	2	145
C. Create information	See 4B			
D. Gather existing information	See 4B			
E. Write report	See 4B			
<b>Reporting Subtotal</b>				
5. Recordkeeping Requirements				
A. Familiarization with Regulatory Requirements	See 4A			
B. Plan activities	See 5E			
C. Implement activities	See 5E			
D. Develop record system	See 5E			
E. Time to enter information	N/A			
Records of all information required by standards <sup>h</sup>	0.33	52	17.16	2,900
F. Time to train personnel	N/A			
G. Time to adjust existing ways to comply with previously applicable requirements	N/A			
H. Time to transmit or disclose information <sup>i</sup>	0.25	1	0.25	290
I. Time for audits	N/A			
<b>Recordkeeping Subtotal</b>				
<b>TOTAL LABOR BURDEN AND COST (rounded)<sup>j</sup></b>				
<b>TOTAL CAPITAL AND O&amp;M COST (rounded)<sup>j</sup></b>				
<b>GRAND TOTAL (rounded)<sup>j</sup></b>				

**Assumptions**

<sup>a</sup> There are an estimated 2,900 existing plating and polishing plants and no new facilities are expected.

<sup>b</sup> This ICR uses the following labor rates: Managerial \$172.41 (\$82.10+ 110%); Technical \$141.75 (\$67.50 + 110%); and Clerical \$108.75 (\$51.75 + 110%). The rates are from the Bureau of Labor Statistics, December 2023, “Table 2. Civilian workers by occupational and industry group.” The rates are from column 1, which shows the average hourly wage rates and the additional overhead business costs of employing workers beyond their wages and benefits, including employees.

<sup>c</sup> We assume that each source subject to the standard will have to familiarize with the regulatory requirements each year.

<sup>d</sup> Each of the 2,900 existing plants noted above would have already submitted an initial notification. Since there are no new facilities

<sup>e</sup> Each of the 2,900 existing plants noted above would have already submitted a notification of compliance status by the appropriate respondents required to submit a notification of compliance status is 0.

<sup>f</sup> The 2,900 existing plants would be required to prepare an annual compliance certification every year. They would only submit the certification if they experience a deviation, the number of compliance certifications submitted will be  $(2,900 \times 0.05) = 145$ .

<sup>g</sup> Assumes that 5% of existing facilities would have to submit a report of deviations starting in Year 3 of the ICR clearance period, or

<sup>h</sup> It is assumed that 0.33 hr (20 minutes) per week will be required per facility for recordkeeping.

<sup>i</sup> Annual transmittals would include submission of annual compliance certifications (145) and reports of deviations (145) for 5% of o

<sup>j</sup> Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

is (40 CFR Part 63, Subpart WWWWWW) (Renewal)

(E)	(F)	(G)	(H)
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 <sup>b</sup>
2,900	145	290	\$456,768.85
0	0	0	\$0
0	0	0	\$0
5,800	290	580	\$913,537.70
290	14.5	29	\$45,676.89
<b>10,339</b>			<b>\$1,415,983</b>
49,764	2,488.2	4,976.4	\$7,838,153.47
72.5	3.63	7.25	\$11,419.22
<b>57,312</b>			<b>\$7,849,572.69</b>
<b>67,700</b>			<b>\$9,270,000</b>
			<b>\$0</b>
			<b>\$9,270,000</b>

Labor Rate
Technical
Management
Clerical

22 hours per respor

71.36 (\$33.98 + 110%). These rates are from the United States Department of Labor, mn 1, "Total compensation." The rates are increased by 110 percent to account for ding business expenses associated with hiring, training, and equipping their

expected, the number of respondents required to submit an initial notification is 0.

compliance date. Since there are no new facilities expected, the number of

certifications if a deviation occurred; assuming that 5 percent of the plants

$(2,900 * 0.05) = 145$  facilities.

one-third of 2,900 facilities, so  $(2,900 * 0.05) * 2 = 145 * 2 = 290$  respondents.

ites
\$141.75
\$172.41
\$71.36

**Table 2: Average Annual EPA Burden and Cost - NESHAP for Plating and Polishing Operations**

Activity	(A)	(B)	(C)	(D)
	EPA Person-hours per occurrence	No. of occurrences per respondent per year	EPA Person-hours per plant per year (A) x (B)	Plants per year
Report Review:				
Initial Notification of applicability <sup>b</sup>	1	1	1	0
Notification of Compliance Status <sup>c</sup>	2	1	2	0
Annual Compliance Certification <sup>d</sup>	2	1	2	145
Annual Report of Deviations <sup>e</sup>	2	1	2	145
<b>TOTAL ANNUAL BURDEN AND COST (rounded)<sup>f</sup></b>				

### Assumptions

<sup>a</sup> This cost is based on the average hourly labor rate as follows: Managerial \$76.91 (GS-13, Step 5, \$48.07 + 60%); Technical \$57.07. This ICR assumes that Managerial hours are 5 percent of Technical hours, and Clerical hours are 10 percent of Technical hours. These rates are based on the 2008 Schedule, which excludes locality, rates of pay. The rates have been increased by 60 percent to account for the benefit packages available.

<sup>b</sup> Assumes no new plants in the next three years.

<sup>c</sup> Each of the 2,900 existing plants noted above would have already submitted a notification of compliance status by the appropriate compliance date. The number of respondents required to submit a notification of compliance status is 0.

<sup>d</sup> The 2,900 existing plants would be required to prepare an annual compliance certification; any plant that experiences a deviation will experience a deviation during the three year ICR period, the number of submittals would be  $(2,900 * 0.05) = 145$ .

<sup>e</sup> Assumes that 5% of existing facilities would have to submit a report of deviations in the three-year ICR period, or  $(2,900 * 0.05) = 145$ .

<sup>f</sup> Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

ns (40 CFR Part 63, Subpart WWWW) (Renewal)

(E)	(F)	(G)	(H)
Technical person-hours (C) x (D)	Managerial person-hours (E) x 0.05	Clerical person- hours (E) x 0.10	Cost, \$ <sup>a</sup>
0	0	0	\$0
0	0	0	\$0
290	14.5	29	\$18,561.02
290	14.5	29	\$18,561.02
667			\$37,100

Labor Rates	
Technical	\$57.07
Management	\$76.91
Clerical	\$30.88

(GS-12, Step 1, \$35.67 + 60%); and Clerical \$30.88 (GS-6, Step 3, \$19.30+ 60%).  
e rates are from the Office of Personnel Management (OPM), 2024 General  
able to government employees.

ompliance date. Since there are no new facilities expected, the number of

ill have to submit the compliance certification; assuming 5 percent of the plants



### **Estimating Capital/Startup and Operation and Maintenance Costs**

The only costs to the regulated industry resulting from information collection activities required by the subject standards are labor costs. There are no capital/startup or operation and maintenance costs.

Total Annual Responses		
(A)	(B)	(C)
Information Collection Activity	Number of Respondents	Number of Responses
Initial Notification of Applicability	0	1
Notification of Compliance Status	0	1
Annual Compliance Certification	145	1
Annual Report of Deviations	145	1
		<b>To</b>

(D)	(E)
Number of Existing Respondents That Keep Records But Do Not Submit Reports	Total Annual Responses $E=(B \times C)+D$
N/A	0
N/A	0
2755	2900
N/A	145
<b>tal</b>	<b>3045</b>

Number of Respondents			
	Respondents That Submit Reports		Respondents That Do Not Submit Any Reports
	(A)	(B)	(C)
Year	Number of New Respondents <sup>† a</sup>	Number of Existing Respondents	Number of Existing Respondents that keep records but do not submit reports
1	0	145	2755
2	0	145	2755
3	0	145	2755
Average	0	145	2755

<sup>† a</sup> New respondents include sources with constructed, reconstructed and modified affected facilities.

nts	
(D)	(E)
Number of Existing Respondents That Are Also New Respondents	Number of Respondents (E=A+B+C-D)
0	2900
0	2900
0	2900
0	2900