

ICR Summary Information

Hours Per Response	6
Number of Respondents	5,800
Total Estimated Burden Hours	39,000
Total Estimated Costs	\$5,340,000
Annualized Capital O&M	Not Applicable
Form Number	Not Applicable

Table 1: Annual Respondent Burden and Cost - NESHAP for Nine Metal Fabrication and Fini

	(A)	(B)
Burden Item	Person-hours per occurrence	No. of occurrences per respondent per year
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. Familiarize with regulatory requirements ^d	0.5	1
B. Required activities		
Initial notification ^c	2	1
Notification of compliance status ^{c, e}	4	1
Annual compliance certification ^f	2	1
Report of exceedances ^g	2	1
C. Create information	See 4B	
D. Gather existing information	See 4B	
E. Write report	See 4B	
Subtotal for Reporting Requirements		
5. Recordkeeping Requirements		
A. Familiarize 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		
Records of all information required by standards ^h	0.25	12
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 ⁱ	0.25	1
I. Time for audits	N/A	
Subtotal for Recordkeeping Requirement		
TOTAL LABOR BURDEN AND COST (rounded)^j		
TOTAL CAPITAL & O&M COST (rounded)^j		
GRAND TOTAL (rounded)^j		

Assumptions:

^a There are an estimated 5,800 existing metal fabrication and finishing facilities subject to the rule with no new facilities expected.

^b This ICR uses the following labor rates: Managerial \$172.41 (\$82.10+ 110%); Technical \$141.75 (\$67.50 + 110%); and Clerical \$7 Statistics, December 2023, “Table 2. Civilian workers by occupational and industry group.” The rates are from column 1, “Total comp additional overhead business costs of employing workers beyond their wages and benefits, including business expenses associated wit

^c One-time notification.

^d We have assumed that each respondent will each take 0.5 hours to familiarize with regulatory requirements.

- ^e We have assumed that each respondent will take four hours to complete the notification of compliance status task.
- ^f We have assumed that each respondent will take two hours once per year to complete the task.
- ^g Percentage of respondents with exceedances is assumed to be 5%.
- ^h We have assumed that each respondent will take 0.25 hours once per month to record information that are required by the standards.
- ⁱ We have assumed that each respondent will take 0.25 hours once per year to transmit or disclose information.
- ^j Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

shing Area Sources (40 CFR Part 63, Subpart XXXXXX) (Renewal)

(C)	(D)	(E)	(F)	(G)	(H)
Person-hours per respondent per year (C=AxB)	Respondents per year ^a	Technical person- hours per year (E=CxD)	Managerial person-hours per year (E x 0.05)	Clerical person-hours per year (E x 0.10)	Total Cost, \$ ^b
0.5	5,800	2,900	145	290	\$456,768.85
2	0	0	0	0	\$0
4	0	0	0	0	\$0
2	5,800	11,600	580	1,160	\$1,827,075.40
2	290	580	29	58	\$91,353.77
		17,342			\$2,375,198.02
3	5,800	17,400	870	1740	\$2,740,613.10
0.25	5,800	1,450	72.5	145	\$228,384.43
		21,678			\$2,968,997.53
		39,000			\$5,340,000
					\$0
					\$5,340,000

\$ 141.75
\$ 172.41
\$ 71.36

6 hr per resp

1.36 (\$33.98 + 110%). These rates are from the United States Department of Labor, Bureau of Labor
ensation.” The rates are increased by 110 percent to account for varying industry wage rates and the
h hiring, training, and equipping their employees.

Technical
Managerial
Clerical

Table 2: Average Annual EPA Burden and Cost - NESHAP for Nine Metal Fabrication and Finishing XXXXXX) (Renewal)

Activity	(A)	(B)	(C)	(D)
	Person-hours per occurrence	No. of occurrences per respondent per year	Person-hours per respondent (C=AxB)	Respondents per year ^a
Report Review:				
Initial Notification ^c	1	1	1	0
Notification of compliance status ^c	2	1	2	0
Annual Certification/ Compliance Report ^d	2	1	2	5,800
Report of exceedances ^{d,e}	2	1	2	290
TOTAL (rounded)^f				

Assumptions:

^a There are an estimated 5,800 existing metal fabrication and finishing facilities subject to the rule with no new facilities expected.

^b 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 (GS-12, Step 5, \$34.42 + 60%). 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 2012 Schedule, which excludes locality, rates of pay. The rates have been increased by 60 percent to account for the benefit packages available to federal employees.

^c One-time notification.

^d We have assumed two hours once per year to review reports.

^e Percentage of respondents with exceedances is assumed to be 5%.

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

ing Area Sources (40 CFR Part 63, Subpart

(E)	(F)	(G)	(H)
Technical person-hours (E=CxD)	Managerial person-hours (Ex0.05)	Clerical person-hours (Ex0.1)	Cost, \$ ^b
0	0	0	\$0
0	0	0	\$0
11,600	580	1,160	\$742,440.60
580	29	58	\$37,122.03
14,000			\$780,000

\$ 57.07
\$ 76.91
\$ 30.88

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

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

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

Number of Respondents			
	Respondents That Submit Reports		Respondents That Do Not Submit Any Reports
	(A)	(B)	(C)
Year	Number of New Respondents ¹	Number of Existing Respondents	Number of Existing Respondents that keep records but do not submit reports
1	0	5,800	0
2	0	5,800	0
3	0	5,800	0
Average	0	5,800	0

¹ 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	5,800
0	5,800
0	5,800
0	5,800

Total Annual Responses			
(A)	(B)	(C)	(D)
Information Collection Activity	Number of Respondents	Number of Responses	Number of Existing Respondents That Keep Records But Do Not Submit Reports
Initial Notification	0	1	N/A
Notification of Compliance Status	0	1	N/A
Annual Certification/ Compliance Report	5,800	1	N/A
Exceedance Reports	290	1	N/A
		Total (rounded)	

(E)
Total Annual Responses $E=(B \times C)+D$
0
0
5,800
290
6,090