

ICR Summary Information

Hours Per Response	219
Number of Respondents	10
Total Estimated Burden Hours	4,380
Total Estimated Costs	\$606,000
Annualized Capital O&M	\$7,370
Form Number	5900-564

Table 1: Annual Respondent Burden and Cost - NESHAP for the Surface Coating of Large Hot

Burden Item	(A)	(B)	(C)
	Person-Hours per occurrence	Number of occurrences per year	Person-Hours per respondent per year (C=A*B)
1. Applications	N/A		
2. Survey and Studies	N/A		
3. Initial performance testing (new sources) ^c			
A. Initial notification	2	1	2
B. Notification of performance test	2	1	2
C. Notification of compliance status	2	1	2
D. Initial performance test report and CPMS performance evaluation	2	1	2
4. Reporting requirements			
A. Familiarization with regulatory requirements ^d	4	1	4
B. Plan activities ^e	8	1	8
C. Training ^e	8	1	8
D. Gather information, monitor, and inspect ^f	12	12	144
E. Process/compile and review ^g	8	12	96
F. Periodic add-on control performance test report ^h	30	1	30
Repeat performance test ^h	30	0.05	1.5
G. Complete semiannual report ⁱ	8	2	16
Subtotal for Reporting Requirements			
5. Recordkeeping requirements			
A. Familiarization with regulatory requirements	See 3A		
B. Plan activities	See 3B		
C. Implement activities	See 3B		
D. Develop record system			
i. Record/disclose ^j	2	52	104
ii. Store/file	0.25	2	0.5
E. Time to enter information			
F. Audits	N/A		
Subtotal for Recordkeeping Requirements			
Total Labor Burden and Costs (rounded) ^k			
Total Capital and O&M Cost (rounded): ^k			
GRAND TOTAL (rounded): ^k			

Assumptions:

^a We have assumed that there are 10 respondents subject to the rule, with no additional new or reconstructed sources becom

^b This ICR uses the following labor rates: Managerial \$172.41 (\$82.10+ 110%); Technical \$141.75 (\$67.50 + 110%); and Labor Statistics, December 2023, “Table 2. Civilian workers by occupational and industry group.” The rates are from column rates and the additional overhead business costs of employing workers beyond their wages and benefits, including business hours are 5 percent of Technical hours, and Clerical hours are 10 percent of Technical hours.

^c We assume that a new source will use an add-on control device to comply with the rule. Sources using an add-on control performance tests are expected to occur.

^d We have assumed that it will take four hours for existing respondents to refamiliarize themselves with rule requirements.

^e We have assumed that it will take eight hours for each respondent to plan activities and eight hours for training.

^f We have assumed that each respondent will take twelve hours twelve times per year to complete task.

^g We have assumed that each respondent will take eight hours twelve times per year to complete task.

^h Facilities that comply using emission capture systems and add-on controls conduct air emissions performance testing before the test, review the test report, and load it to ERT. We assume 5% of tests will fail and have to re-test. Permits indicate that controls option to demonstrate compliance and one facility using add-on controls is required to perform testing as part of the amendment does not add any new testing burden.

ⁱ We have assumed that each respondent will take eight hours twice per year to complete reports.

^j We have assumed that each respondent will take two hours each week to record and disclose information.

^k Totals have been rounded to three significant digits. Figures may not add exactly due to rounding.

Household and Commercial Appliances (40 CFR Part 63, Subpart NNNN) (Renewal)

(D)	(E)	(F)	(G)	(H)
Respondents per year ^a	Technical person-hours per year (E=C*D)	Management person-hours per year (F=E*0.05)	Clerical person-hours per year (G=E*0.1)	Annual costs (\$) ^b
0	0	0	0	\$0
0	0	0	0	\$0
0	0	0	0	\$0
0	0	0	0	\$0
10	40	2	4	\$6,300.26
10	80	4	8	\$12,600.52
10	80	4	8	\$12,600.52
10	1,440	72	144	\$226,809.36
10	960	48	96	\$151,206.24
0	0	0	0	\$0
0	0	0	0	\$0
10	160	8	16	\$25,201.04
	3,174			\$434,718
10	1,040	52	104	\$163,806.76
10	5	0.25	0.5	\$787.53
	1,202			\$164,594
	4,380			\$599,000
				\$7,370
				\$606,000

being subject to the rule over the next three years.

Clerical \$71.36 (\$33.98 + 110%). These rates are from the United States Department of Labor, Bureau of Economic Analysis, "Total compensation." The rates are increased by 110 percent to account for varying industry wage rates and expenses associated with hiring, training, and equipping their employees. This ICR assumes that Managerial

will use a CPMS to verify compliance with the rule. Because there are no new sources, no initial

on or before March 15, 2022. Labor totals include hours for the facility to obtain the testing contractor, plan and attend to the testing, and record the results. Nine of the ten facilities are using the compliant materials option or the emission rate without add-on. Therefore, the periodic testing requirement from the 2019 RTR for their 40 CFR part 70 operating permit renewal.

Labor Rates	
Management	\$172.41
Technical	\$141.75
Clerical	\$71.36

Hours per Response	
4380	# hours
20	# responses
219	hr/resp

Table 2: Average Annual EPA Burden and Cost - NESHAP for the Surface Coating of Large Commercial and Industrial Sources (Renewal)

Activity	(A)	(B)	(C)
	Person-hours per activity	Number of occurrences per year	Person hours per respondent per year (C = A*B)
1. Initial add-on control performance test ^c	24	0	0
2. Repeat add-on control performance test ^c	24	0	0
3. Review notifications and reports - new sources ^d			
A. Initial notification	4	1	4
B. Notification of performance test	8	1	8
C. Notification of compliance status	8	1	8
D. Performance test report and CPMS evaluation	8	1	8
3. Periodic Testing ^e			
A. Review notification of performance test	4	1	4
B. Review add-on control performance test report	8	1	8
4. Semiannual report review ^f	12	2	24
TOTAL (rounded) ^g			

Assumptions:

^a We have assumed that there are 10 respondents subject to the rule, with no additional new or reconstructed sources and no initial performance tests are expected to occur.

^b This cost is based on the average hourly labor rate as follows: Managerial \$76.91 (GS-13, Step 5, \$48.07 + 60%); 10% (\$19.30 + 60%). This ICR assumes that Managerial hours are 5 percent of Technical hours, and Clerical hours are 10 percent of Managerial hours (OPM), 2024 General Schedule, which excludes locality, rates of pay. The rates have been increased by 60 percent to reflect inflation.

^c There are no new sources. Therefore, no initial performance tests are expected to occur.

^d Based on Agency experience, we assume that it will take four hours to review the initial notification, 8 hours to review the performance test report and CPMS evaluation.

^e Based on Agency experience, we assume that it will take four hours to review the notification of the test and 8 hours to review the performance test report.

^f We have assumed that it will take the Agency 12 hours to review the semiannual report for each respondent.

^g Totals have been rounded to three significant digits. Figures may not add exactly due to rounding.

ge Household and Commercial Appliances (40 CFR Part 63, Subpart

(D)	(E)	(F)	(G)	(H)
Respondents per year ^a	Technical person-hours per year (E=C*D)	Management person-hours per year (F=E*0.05)	Clerical person-hours per year (G=E*0.1)	Annual Costs (\$/yr) ^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	0	0	\$0
0	0	0	0	\$0
10	240	12	24	\$15,361.34
	276			\$15,400

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

; becoming subject to the rule over the next three years. Because there are no new sources,

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

view the notification of the test, 8 hours to review the notification of compliance status, and

rs to review the performance test report.

Capital/Startup vs. Operation and Maintenance (O&M) Costs					
(A)	(B)	(C)	(D)	(E)	(F)
Continuous Monitoring Device	Capital/Startup Cost for One Respondent ^a	Number of New Respondents	Total Capital/Startup Cost, (B X C)	Annual O&M Costs for One Respondent ^b	Number of Respondents with O&M ^c
Continuous Monitoring Device	\$24,409	0	\$0	\$7,371	1
Total (rounded) ^d			\$0		

^a This ICR updates the capital costs from 2009 dollars (CEPCI CE Index 521.9) to 2024 dollars (CEPCI CE Index 797.9).

^b Comments received from Whirlpool Corporation during previous industry consultation suggested that annual O&M cost from 24 to 80 hours at a technician's pay grade. To calculate annual O&M costs, an average of 52 hours was assumed and by the technical labor rate of \$141.75.

^c Permit data indicates that only one affected source uses an emission control device to comply with the NESHAP.

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

(G)
Total O&M, (E X F)
\$7,371
\$7,370

2009 CEPCI CE Index	521.9
2024 CEPCI CE Index	796.2
Ratio	1.5255796

can vary
multiplied

Number of Respondents					
	Respondents That Submit Reports		Respondents That Do Not Submit Any Reports		
	(A)	(B)	(C)	(D)	(E)
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	Number of Respondents (E=A+B+C-D)
1	0	10	0	0	10
2	0	10	0	0	10
3	0	10	0	0	10
Average	0	10	0	0	10

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

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 $E=(B \times C)+D$
Initial notification	0	1	0	0
Notification of performance test	0	1	0	0
Notification of compliance status	0	1	0	0
Initial performance test report and CMS evaluation	0	1	0	0
Periodic add-on control performance test report	0	1	0	0
Repeat performance test	0	0.05	0	0
Semiannual report	10	2	0	20
Total				20