

**SUPPORTING STATEMENT  
ENVIRONMENTAL PROTECTION**

**National Emission Standards for Hazardous Air Pollutants for Surface Coating of Metal**

**ATTACHMENT 1**

**TABLES 1, 2, 3, and 4**

Annual Respondent Burden and Cost of Recordkeeping and Reporting Requirements

Summary of Annual Respondent Burden and Cost of Recordkeeping and Reporting ]

**ATTACHMENT 2**

**TABLES 5, 6, 7, and 8**

Annual Agency Burden and Cost of Recordkeeping and Reporting Requirements for

Summary of Annual Agency Burden and Cost of Recordkeeping and Reporting Requi

**F**  
**AGENCY**

**Furniture (40 CFR Part 63, Subpart RRRR) (Amendments)**

Requirements for the Surface Coating of Metal Furniture NESHAP – Years 1-3 (Amendments)

Requirements for the Surface Coating of Metal Furniture NESHAP (Amendments)

Requirements for the Surface Coating of Metal Furniture NESHAP - Year 1-3 (Amendments)

Requirements for the Surface Coating of Metal Furniture NESHAP (Amendments)

<b>Respondent Wages (\$2016)</b>		
<b>Category (1)</b>	<b>Hourly Mean Wage (2)</b>	<b>Loaded Wage (3)</b>
Technical	\$43.02	\$90.34
Clerical	\$17.96	\$37.72
Managerial	\$52.87	\$111.03

Footnotes:

(1) The Wage categories "Technical," "Clerical," and "Managerial" refer to the labor category codes 11-3051, 43-6010, and 11-1021, respectively, in the United States Department of Labor, Bureau of Labor Statistics table titled "May 2016 National Industry-Specific Occupational Employment and Wage Estimates NAICS 337000 - Furniture and Related Product Manufacturing," found here:  
[https://www.bls.gov/oes/current/naics3\\_337000.htm](https://www.bls.gov/oes/current/naics3_337000.htm)

(2) Selected "mean hourly wage" in the table referenced in footnote 1.

(3) Loaded Wage is the 2016 Wage increased by 110 percent to account for the benefit packages available to those employed by private industry.

<b>EPA Wages (\$2016)</b>		
<b>Category (1)</b>	<b>Hourly Mean Wage</b>	<b>Wage With Fringe &amp; Overhead (2)</b>
(GS- 12, step 1) - Technical	\$30.05	\$48.08
(GS- 13, step 5) - Managerial	\$40.50	\$64.80
(GS-6, step 3) - Clerical	\$16.26	\$26.02

Footnotes:

(1) The hourly mean wage for each category is found here:  
<https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salar>

(2) Wage with fringe and overhead is the hourly mean wage increased by 60 percent to account for the benefit packages available to government employees.

Table 1: Annual Respondent Burden and Cost – NESHAP for Surface Coating of Metal Furniture (40 C

Burden Item	(A) Person-hours per occurrence	(B) Number of occurrences per year	(C) Person-hrs. per respondent per year (C=AxB)	(D) Respondents per year
<b>1. Reporting requirements</b>				
a. Familiarize with rule requirements	4	1	4	583
b. Process/review information	4	4	16	583
<b>c. Write reports</b>				
i. Initial notification	2	1	2	0
ii. Notification of compliance status	2	1	2	0
iii. Notification of construction/reconstruction	2	1	2	0
iv. Notification of actual startup	2	1	2	0
v. Notification of performance test	2	1.2	2.4	0
vi. Report of performance test	10	1.2	12	0
vii. Semiannual report	6	2	12	583
viii. Excess emissions report	4	0.5	2	583
ix. Startup, shutdown, malfunction report	4	0.5	2	583
<b>Subtotal for Reporting Requirements</b>				
<b>2. Recordkeeping requirements</b>				
a. Familiarize with rule requirements	4	1	4	583
b. Plan activities	12	1	12	583
c. Implement activities	12	1	12	583
d. Maintain record system for material used	20	1	20	583
<b>e. Time to enter information</b>				
i. Material usage	0.5	260	130	583
ii. Compliance calculation	2	12	24	583
f. Time to train personnel	10	1	10	583
g. Store, file, and maintain records	2	12	24	583
h. Retrieve records/reports	1	12	12	583
<b>Subtotal for Recordkeeping Requirements</b>				
<b>TOTAL ANNUAL BURDEN AND COSTS (rounded):<sup>§</sup></b>				
<b>Capital and O&amp;M Cost (see Section 6(b)(iii)):<sup>§</sup></b>				
<b>TOTAL COST:<sup>§</sup></b>				

**Assumptions:**

- <sup>a</sup> We have assumed that there are approximately 583 respondents, with no additional new or reconstructed sources.
- <sup>b</sup> This ICR uses the following labor rates: \$111.03 per hour for Executive, Administrative, and Managerial labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, "May 2016 National Estimates NAICS 337000 - Furniture and Related Product Manufacturing." The rates are from column 1, "Total for the benefit packages available to those employed by private industry."
- <sup>c</sup> We have assumed that each respondent will take six hours twice per year to complete the semiannual report.
- <sup>d</sup> We have assumed that each respondent will take four hours twice per year to complete the excess emissions report.
- <sup>e</sup> We have assumed that each respondent will take 0.5 hours 260 times per year to enter information.
- <sup>f</sup> We have assumed that each respondent will have to complete task once per month.
- <sup>§</sup>Totals have been rounded to 3 significant values. Figures may not add exactly due to rounding.

Table 2: Average Annual EPA Burden and Cost – NESHAP for Surface Coating of Metal Furniture (40 C

Burden Item	(A) Person-hours per activity	(B) Number of activities per year	(C) Technical person-hours per year (C=AxB)	(D) Management person-hours per year (D=Cx0.05)
1. Initial performance test	24	0	0	0
2. Repeat performance test	24	0	0	0
3. Report review				
a) Initial notification	8	0	0	0
b) Notification of performance test	8	0	0	0
c) Notification of compliance status	8	0	0	0
d) Notification of construction/reconstruction	8	0	0	0
e) Notification of actual startup	8	0	0	0
f) Notification of performance test	8	0	0	0
g) Report of performance test	8	0	0	0
h) Semiannual report	12	1,166	13,992	699.6
i) Excess emissions report	8	291.5	2,332	116.6
j) Startup, shutdown, malfunction report	8	291.5	2,332	116.6
<b>Total Burden (Hrs) and Costs</b>				<b>21,500</b>

**Assumptions:**

<sup>a</sup> This cost is based on the following labor rates which incorporates a 1.6 benefits multiplication factor to account for (GS-13, Step 5, \$40.50 + 60%) for Managerial, \$48.08 (GS-12, Step 1, \$30.05 + 60%) for Technical, and \$26.0 rates are from the Office of Personnel Management (OPM) “2015 General Schedule” which excludes locality rates.

<sup>b</sup> The semiannual report would have to be completed twice per year.

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

FR Part 63, Subpart RRRR) (Amendments)

(E) Technical person-hrs. per year (E=CxD)	(F) Management person-hrs. per year (F=Ex0.05)	(G) Clerical person-hrs. per year (G=Ex0.1)	(H) Annual costs (\$)
2,332	116.6	233.2	\$232,419
9,328	466.4	932.8	\$929,675
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
0	0	0	\$0
6,996	349.8	699.6	\$697,256
1,166	58.3	116.6	\$116,209
1,166	58.3	116.6	\$116,209
<b>24,136</b>			<b>\$2,091,768</b>
2,332	116.6	233.2	\$232,419
6,996	349.8	699.6	\$697,256
6,996	349.8	699.6	\$697,256
11,660	583	1166	\$1,162,093
75,790	3789.5	7579	\$7,553,607
13,992	699.6	1399.2	\$1,394,512
5,830	291.5	583	\$581,047
13,992	699.6	1399.2	\$1,394,512
6,996	349.8	699.6	\$697,256
<b>166,272</b>			<b>\$14,409,957</b>
<b>190,000</b>			<b>\$16,500,000</b>
			<b>\$700,000</b>
			<b>\$17,200,000</b>

rces becoming subject to the rule over the next three years.  
 or; \$90.34 per hour for Technical labor, and \$37.72 per hour for Clerical  
 onal Industry-Specific Occupational Employment and Wage  
 il Compensation.” The rates have been increased by 110% to account

ports and also four hours twice per year for the SSM reports.

CFR Part 63, Subpart RRRR) (Amendments)

(E) Clerical person-hours per year (E=Cx0.1)	(F) Annual costs (\$/yr)
0	\$0
0	\$0
0	\$0
0	\$0
0	\$0
0	\$0
0	\$0
0	\$0
0	\$0
1399.2	\$754,471
233.2	\$125,745
233.2	\$125,745
	<b>\$1,006,000</b>

Amount for government overhead expenses: \$64.80  
 1/2 (GS-6, Step 3, \$16.26 + 60%) for Clerical. These  
 rates of pay.

**Table 1 - Annual Respondent Burden and Cost of Recordkeeping and Reporting Requirements for the Surface Coating of Metal Furniture NESHP  
Year 1 (Amendments)**

Burden item	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)	(I)	(J)
	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>	Total Number of Responses per Year (E=BXD)	Technical person-hours per year (F=CxD)	Management person hours per year (G=Fx0.05)	Clerical person hours per year (H=Fx0.1)	Total Hours per Year (I=F+G+H)	Total Cost Per year <sup>b</sup>
1 Familiarization with rule requirements <sup>c</sup>	4	1	4	16	16	64	3.2	6.4	73.6	\$6,379
2 Plan activities	0	0	0	0	0	0	0	0	0	\$0
3 Training <sup>d</sup>	8	1	0	0	0	0	0	0	0	\$0
4 Add-on control performance test <sup>e</sup>	16	0	0	0	0	0	0	0	0	\$0
Repeat failed performance test <sup>f</sup>										\$0
5 Gather info, monitor, inspect, and determine compliance <sup>g</sup>	12	12	144	0	0	0	0	0	0	\$0
6 Process/compile and review <sup>h</sup>	8	12	96	0	0	0	0	0	0	\$0
7 Complete notifications and reports <sup>i</sup>	30	1	30	0	0	0	0	0	0	\$0
<b>Subtotal for Reporting Requirements</b>							<b>74</b>			<b>\$6,379</b>
8 Record/transmit/disclose <sup>j</sup>	2	52	0	0	0	0	0	0	0	\$0
Due To Proposed Revisions <sup>k</sup>	8	2	16	16	32	256	12.8	25.6	294.4	\$25,514
9 Store/file <sup>l</sup>	0.25	2	0	0	0	0	0	0	0	\$0
10 Reporting and recordkeeping	0	0	0	0	0	0	0	0	0	\$0
<b>Subtotal for Recordkeeping Requirements</b>							<b>294</b>			<b>\$25,514</b>
<b>TOTAL LABOR BURDEN AND COST (rounded)</b>										<b>\$31,900</b>
<b>Capital and O&amp;M Cost (see Section 6(b)(iii)); <sup>m</sup></b>										<b>\$0</b>
<b>TOTAL COST</b>					48					<b>\$31,900</b>

**Assumptions:**

<sup>a</sup> It is assumed that there are 16 sources that are subject to the standard, and no additional new sources will become subject to the rule over the next three years.

<sup>b</sup> This ICR uses the following labor rates: \$111.03 per hour for Executive, Administrative, and Managerial labor; \$90.34 per hour for Technical labor, and \$37.72 per hour for Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, "May 2016 National Industry-Specific Occupational Employment and Wage Estimates NAICS 337000 - Furniture and Related Product Manufacturing." The rates are from column 1, "Total Compensation." The rates have been increased by 110% to account for the benefit packages available to those employed by private industry.

<sup>c</sup> It is assumed that each respondent will take 4 hours to read the rule and instructions.

<sup>d</sup> The proposed RTR amendments do not impact this item. The current ICR assumes each respondent will take ten hours, once per year to plan activities and train staff.

<sup>e</sup> If a source owner or operator chooses to comply with the standards using add-on controls, the results of an initial performance test are used to determine compliance; however, the rule does not require on-going periodic performance testing for these emission capture systems and add-on controls. The EPA specifically is requesting comment on whether performance testing should be required anytime a source plans to undertake an operational change that may adversely affect compliance with an applicable standard, operating limit, or parametric monitoring value.

<sup>f</sup> It is assumed that 20 percent of respondents will have to repeat performance tests.

<sup>g</sup> The current ICR assumes each respondent will take twelve hours, twelve times per year to complete task. Labor totals include hours for the facility to coordinate with suppliers, and gather information on monitoring and emissions. The proposed RTR amendments do not impact this item.

<sup>h</sup> The proposed RTR amendments do not impact this item. The current ICR assumes each respondent will take four hours, four times per year to complete task.

<sup>i</sup> The proposed RTR amendments do not impact this item. The current ICR assumes that each respondent will take ten hours for notifications, ten hours for performance test, and ten hours for reports.

<sup>j</sup> The current ICR assumes each respondent will take one hour two times per week to record and disclose information. EPA is proposing to require sources to electronically submit semiannual reports starting 2 years after the effective date of the final rule. It is assumed that this will not increase labor.

<sup>k</sup> We are proposing the elimination of the startup, shutdown, and malfunction (SSM) exemption in this rule. Costs associated with elimination of the SSM exemption include time for re-evaluating previously developed SSM record systems in year one. Costs are also associated with the use of electronic reporting and include time to become familiar with CEDRI and the semi-annual reporting form. Two responses with 8 hours per response.

<sup>l</sup> The proposed RTR amendments do not impact this item. The current ICR assumes that each respondent will take half an hour annually to store and file reports.

<sup>m</sup> EPA is proposing to require the use of high efficiency spray guns where the source is not using add-on controls. Because of the economic incentives to use high efficiency application methods for spray applied coatings, we do not expect any facilities will have to switch to high efficiency application methods.

**Table 2 - Annual Respondent Burden and Cost of Recordkeeping and Reporting  
Year 2 (Amendments)**

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 Familiarization with rule requirements <sup>c</sup>	4	1	4
2 Plan activities	0	0	0
3 Training <sup>d</sup>	8	1	0
4 Add-on control performance test <sup>e</sup>	16	0	0
Repeat failed performance test <sup>f</sup>			
5 Gather info, monitor, inspect, and determine compliance <sup>g</sup>	12	12	144
6 Process/compile and review <sup>h</sup>	8	12	96
7 Complete notifications and reports <sup>i</sup>	8	2	16
<b>Subtotal for Reporting Requirements</b>			
8 Record/transmit/disclose <sup>j</sup>	2	52	0
Due To Proposed Revisions <sup>k</sup>	8	2	16
9 Store/file <sup>l</sup>	0.25	2	0
10 Reporting and recordkeeping	0	0	0
<b>Subtotal for Recordkeeping Requirements</b>			
<b>TOTAL LABOR BURDEN AND COST (rounded)</b>			
<b>Capital and O&amp;M Cost (see Section 6(b)(iii)): <sup>m</sup></b>			
<b>TOTAL COST</b>			

**Assumptions:**

<sup>a</sup> It is assumed that there are 16 sources that are subject to the standard, and no additional new sources will become subject to the standard.

<sup>b</sup> This ICR uses the following labor rates: \$111.03 per hour for Executive, Administrative, and Managerial labor; \$90.34 per hour for other labor. Source: U.S. Department of Labor, Bureau of Labor Statistics, "May 2016 National Industry-Specific Occupational Employment and Wage Estimates." The rates have been increased by 110% to account for the benefit packages available to those employees.

<sup>c</sup> It is assumed that each respondent will take 4 hours to read the rule and instructions.

<sup>d</sup> The proposed RTR amendments do not impact this item. The current ICR assumes each respondent will take ten hours, ten times per year to complete this task.

<sup>e</sup> If a source owner or operator chooses to comply with the standards using add-on controls, the results of an initial performance testing for these emission capture systems and add-on controls. The EPA specifically is requesting comment on whether such testing will adversely affect compliance with an applicable standard, operating limit, or parametric monitoring value.

<sup>f</sup> It is assumed that 20 percent of respondents will have to repeat performance tests.

<sup>g</sup> The current ICR assumes each respondent will take twelve hours, twelve times per year to complete task. Labor totals in the current ICR for proposed RTR amendments do not impact this item.

<sup>h</sup> The proposed RTR amendments do not impact this item. The current ICR assumes each respondent will take four hours, four times per year to complete this task.

<sup>i</sup> The proposed RTR amendments do not impact this item. The current ICR assumes that each respondent will take ten hours, ten times per year to complete this task.

<sup>j</sup> The current ICR assumes each respondent will take one hour two times per week to record and disclose information. EPA is requesting comment on the date of the final rule. It is assumed that this will not increase labor.

<sup>k</sup> We are proposing the elimination of the startup, shutdown, and malfunction (SSM) exemption in this rule. Costs associated with the use of electronic reporting systems in year one. Costs are also associated with the use of electronic reporting and include time to become familiar with the system.

<sup>l</sup> The proposed RTR amendments do not impact this item. The current ICR assumes that each respondent will take half an hour, two times per week to store and file information.

<sup>m</sup> EPA is proposing to require the use of high efficiency spray guns where the source is not using add-on controls. Because we expect any facilities will have to switch to high efficiency application methods.



∃ of the economic incentives to use high efficiency application methods for spray applied coatings, we do not

**Table 3 - Annual Respondent Burden and Cost of Recordkeeping and Reporting Requirements  
Year 3 (Amendments)**

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 Familiarization with rule requirements <sup>c</sup>	4	1	4
2 Plan activities	0	0	0
3 Training <sup>d</sup>	8	1	0
4 Add-on control performance test <sup>e</sup>	16	0	0
Repeat failed performance test <sup>f</sup>			
5 Gather info, monitor, inspect, and determine compliance <sup>g</sup>	12	12	144
6 Process/compile and review <sup>h</sup>	8	12	96
7 Complete notifications and reports <sup>i</sup>	8	2	16
<b>Subtotal for Reporting Requirements</b>			
8 Record/transmit/disclose <sup>j</sup>	2	52	0
Due To Proposed Revisions <sup>k</sup>	8	2	16
9 Store/file <sup>l</sup>	0.25	2	0
10 Reporting and recordkeeping	0	0	0
<b>Subtotal for Recordkeeping Requirements</b>			
<b>TOTAL LABOR BURDEN AND COST (rounded)</b>			
<b>Capital and O&amp;M Cost (see Section 6(b)(iii)): <sup>m</sup></b>			
<b>TOTAL COST</b>			

**Assumptions:**

<sup>a</sup> It is assumed that there are 16 sources that are subject to the standard, and no additional new sources will become subject to the standard.

<sup>b</sup> This ICR uses the following labor rates: \$111.03 per hour for Executive, Administrative, and Managerial labor; \$90.34 per hour for Professional labor; and \$45.17 per hour for all other labor. The rates are based on the Department of Labor, Bureau of Labor Statistics, "May 2016 National Industry-Specific Occupational Employment and Wage Estimates." The rates have been increased by 110% to account for the benefit packages available to those employees.

<sup>c</sup> It is assumed that each respondent will take 4 hours to read the rule and instructions.

<sup>d</sup> The proposed RTR amendments do not impact this item. The current ICR assumes each respondent will take ten hours, and the proposed RTR amendments do not impact this item.

<sup>e</sup> If a source owner or operator chooses to comply with the standards using add-on controls, the results of an initial performance testing for these emission capture systems and add-on controls. The EPA specifically is requesting comment on whether such testing will adversely affect compliance with an applicable standard, operating limit, or parametric monitoring value.

<sup>f</sup> It is assumed that 20 percent of respondents will have to repeat performance tests.

<sup>g</sup> The current ICR assumes each respondent will take twelve hours, twelve times per year to complete task. Labor totals in the current ICR for this item. The proposed RTR amendments do not impact this item.

<sup>h</sup> The proposed RTR amendments do not impact this item. The current ICR assumes each respondent will take four hours, and the proposed RTR amendments do not impact this item.

<sup>i</sup> The proposed RTR amendments do not impact this item. The current ICR assumes that each respondent will take ten hours, and the proposed RTR amendments do not impact this item.

<sup>j</sup> The current ICR assumes each respondent will take one hour two times per week to record and disclose information. EPA is requesting comment on whether the proposed RTR amendments will increase labor. It is assumed that this will not increase labor.

<sup>k</sup> We are proposing the elimination of the startup, shutdown, and malfunction (SSM) exemption in this rule. Costs associated with the use of electronic reporting and include time to become familiar with the systems in year one. Costs are also associated with the use of electronic reporting and include time to become familiar with the systems in year one.

<sup>l</sup> The proposed RTR amendments do not impact this item. The current ICR assumes that each respondent will take half an hour, and the proposed RTR amendments do not impact this item.

<sup>m</sup> EPA is proposing to require the use of high efficiency spray guns where the source is not using add-on controls. Because we expect any facilities will have to switch to high efficiency application methods.



of the economic incentives to use high efficiency application methods for spray applied coatings, we do not

**Table 4 - Summary of Annual Respondent Burden and Cost of Recordkeeping Requirements for the Surface Coating of Metal Furniture NESI**

Year	Technical Hours	Clerical Hours	Management Hours	Total Labor Hours	Labor Costs
1	320	32	16	368	\$32,000
2	0	0	0	0	\$0
3	0	0	0	0	\$0
Total	320	32	16	368	\$32,000
Average	107	11	5.3	123	\$11,000

  

Year	Number of Respondents	Number of Responses	Reporting Hours	Recordkeeping Hours	Total Hours
1	16	48	74	294	368
2	16	0	0	0	0
3	16	0	0	0	0
Total	48	48	74	294	368
Average	16	16	25	98	123

(a) = Average annual additional costs per respondent: \$690

**Recordkeeping and Reporting  
HAP (Amendments)**

Non-Labor (Capital/Startup and O&M) Costs	Total Costs
\$0	\$32,000
\$0	\$0
\$0	\$0
\$0	\$32,000
\$0	\$11,000
Hours per Response	Hours Per Respondent
8.0	23
0	0
0	0
8.0	23
2.7	7.7

**Table 5 - Annual Agency Burden and Cost of Recordkeeping and Reporting |  
- Year 1 (Amend)**

Activity	(A)	(B)
	EPA person-hours per occurrence	No. of occurrences per plant per year
1 Add-on control performance test <sup>a, c, d</sup>	24	0
2 Repeat failed performance test <sup>d</sup>	24	0
3 Report review		
a) Initial notification <sup>e</sup>	4	1
b) Performance test report <sup>f</sup>	8	1
c) Notification of compliance status <sup>g</sup>	8	1
d) Semiannual reports <sup>h</sup>	12	2
Due To Proposed Revisions <sup>i</sup>	2	2
<b>TOTAL ANNUAL BURDEN AND COST (rounded)</b>		

**Assumptions:**

<sup>a</sup> It is assumed that there are 16 sources that are subject to the standard, and no additional new sources will be added.

<sup>b</sup> This cost is based on the following labor rates: Managerial rate of \$64.80 (GS-13, Step 5, \$40.50 + 60%), Technical rate of \$16.26 (GS-11, Step 3, \$10.16 + 60%). These rates are from the Office of Personnel Management (OPM), 2017 General Schedule (GS) Pay Schedule. These rates account for the benefit packages available to government employees.

<sup>c</sup> The proposed RTR amendments do not impact this item. The current ICR assumes it will take 24 hours to complete.

<sup>d</sup> If a source owner or operator chooses to comply with the standards using add-on controls, the results of an add-on control performance testing for these emission capture systems and add-on controls. The EPA specifically is requesting a change that may adversely affect compliance with an applicable standard, operating limit, or parametric monitoring.

<sup>e</sup> It is assumed that it will take four hours to review the notification of the test and the test plan for each respondent.

<sup>f</sup> It is assumed that it will take eight hours to review the test report for each respondent.

<sup>g</sup> The proposed RTR amendments do not impact this item. The current ICR assumes that it will take eight hours to complete.

<sup>h</sup> The proposed RTR amendments do not impact this item. The current ICR assumes that it will take twelve hours to complete.

<sup>i</sup> EPA is proposing the elimination of the startup, shutdown, and malfunction (SSM) exemption in this rule. Cost of recordkeeping systems in year one.

**Requirements for the Surface Coating of Metal Furniture NESHAP  
(Requirements)**

(C)	(D)	(E)	(F)	(G)	(H)
EPA person-hours per plant per year (C=AxB)	Plants per year <sup>a</sup>	Technical person- hours per year (E=CxD)	Management person-hours per year (F=Ex0.05)	Clerical person-hours per year (G=Ex0.1)	Cost, \$ <sup>b</sup>
0	0	0	0	0	\$0
0	0	0	0	0	\$0
					\$0
4	0	0	0	0	\$0
8	0	0	0	0	\$0
0	0	0	0	0	\$0
0	0	0	0	0	\$0
4	16	64	3.2	6.4	\$3,451
<b>74</b>					<b>\$3,500</b>

become subject to the rule over the next three years.

Technical rate of \$48.08 (GS-12, Step 1, \$30.05 + 60%), and Clerical rate of \$26.02 (GS-6, schedule, which excludes locality rates of pay. The rates have been increased by 60 percent to

complete the task for each respondent.

initial performance test are used to determine compliance; however, the rule does not require on-going periodic testing. The rule also requires an initial comment on whether performance testing should be required anytime a source plans to undertake an operational change that would increase the source's operating value.

respondent.

respondents, once a year to review the compliance stats for each respondent.

respondents, twice a year to review the test reports, twice a year for each respondent.

costs associated with elimination of the SSM exemption include time for evaluating new SSM

**Table 6 - Annual Agency Burden and Cost of Recordkeeping and Reporting  
- Year 2 (Amendments)**

Activity	(A)	(B)
	EPA person-hours per occurrence	No. of occurrences per plant per year
1 Add-on control performance test <sup>a, c, d</sup>	24	0
2 Repeat failed performance test <sup>d</sup>	24	0
3 Report review		
a) Initial notification <sup>e</sup>	4	1
b) Performance test report <sup>f</sup>	8	1
c) Notification of compliance status <sup>g</sup>	8	1
d) Semiannual reports <sup>h</sup>	12	2
Due To Proposed Revisions <sup>i</sup>	2	2
<b>TOTAL ANNUAL BURDEN AND COST (rounded)</b>		

**Assumptions:**

<sup>a</sup> It is assumed that there are 16 sources that are subject to the standard, and no additional new sources will be added.

<sup>b</sup> This cost is based on the following labor rates: Managerial rate of \$64.80 (GS-13, Step 5, \$40.50 + 60%), Technical rate of \$32.40 (GS-11, Step 5, \$20.25 + 60%), and Step 3, \$16.26 + 60%). These rates are from the Office of Personnel Management (OPM), 2017 General Schedule. These rates account for the benefit packages available to government employees.

<sup>c</sup> The proposed RTR amendments do not impact this item. The current ICR assumes it will take 24 hours to conduct a performance test.

<sup>d</sup> If a source owner or operator chooses to comply with the standards using add-on controls, the results of an add-on control performance test are used to determine compliance. The EPA specifically is requesting a change that may adversely affect compliance with an applicable standard, operating limit, or parametric monitoring system.

<sup>e</sup> It is assumed that it will take four hours to review the notification of the test and the test plan for each respondent.

<sup>f</sup> It is assumed that it will take eight hours to review the test report for each respondent.

<sup>g</sup> The proposed RTR amendments do not impact this item. The current ICR assumes that it will take eight hours to review the notification of compliance status.

<sup>h</sup> The proposed RTR amendments do not impact this item. The current ICR assumes that it will take twelve hours to review semiannual reports.

<sup>i</sup> EPA is proposing the elimination of the startup, shutdown, and malfunction (SSM) exemption in this rule. Compliance with the rule will be required for all recordkeeping systems in year one.

## Requirements for the Surface Coating of Metal Furniture NESHAP (Requirements)

(C)	(D)	(E)	(F)	(G)	(H)
EPA person-hours per plant per year (C=AxB)	Plants per year <sup>a</sup>	Technical person- hours per year (E=CxD)	Management person-hours per year (F=Ex0.05)	Clerical person-hours per year (G=Ex0.1)	Cost, \$ <sup>b</sup>
0	0	0	0	0	\$0
0	0	0	0	0	\$0
					\$0
4	0	0	0	0	\$0
8	0	0	0	0	\$0
0	0	0	0	0	\$0
0	0	0	0	0	\$0
4	0	0	0	0	\$0
<b>0</b>					<b>\$0</b>

become subject to the rule over the next three years.

Technical rate of \$48.08 (GS-12, Step 1, \$30.05 + 60%), and Clerical rate of \$26.02 (GS-6, schedule, which excludes locality rates of pay. The rates have been increased by 60 percent to

complete the task for each respondent.

initial performance test are used to determine compliance; however, the rule does not require on-going periodic testing or comment on whether performance testing should be required anytime a source plans to undertake an operational activity of significant value.

Identify

Reports, once a year to review the compliance stats for each respondent.

Reports to review the test reports, twice a year for each respondent.

Resources associated with elimination of the SSM exemption include time for evaluating new SSM

**Table 7 - Annual Agency Burden and Cost of Recordkeeping and Reporting  
- Year 3 (Amendments)**

Activity	(A)	(B)
	EPA person-hours per occurrence	No. of occurrences per plant per year
1 Add-on control performance test <sup>a, c, d</sup>	24	0
2 Repeat failed performance test <sup>d</sup>	24	0
3 Report review		
a) Initial notification <sup>e</sup>	4	1
b) Performance test report <sup>f</sup>	8	1
c) Notification of compliance status <sup>g</sup>	8	1
d) Semiannual reports <sup>h</sup>	12	2
Due To Proposed Revisions <sup>i</sup>	2	2
<b>TOTAL ANNUAL BURDEN AND COST (rounded)</b>		

**Assumptions:**

<sup>a</sup> It is assumed that there are 16 sources that are subject to the standard, and no additional new sources will be added.

<sup>b</sup> This cost is based on the following labor rates: Managerial rate of \$64.80 (GS-13, Step 5, \$40.50 + 60%), Technical rate of \$32.40 (GS-11, Step 5, \$20.25 + 60%), and Step 3, \$16.26 + 60%). These rates are from the Office of Personnel Management (OPM), 2017 General Schedule. These rates account for the benefit packages available to government employees.

<sup>c</sup> The proposed RTR amendments do not impact this item. The current ICR assumes it will take 24 hours to conduct a performance test.

<sup>d</sup> If a source owner or operator chooses to comply with the standards using add-on controls, the results of an add-on control performance test are used to determine compliance. The EPA specifically is requesting a change that may adversely affect compliance with an applicable standard, operating limit, or parametric monitoring system.

<sup>e</sup> It is assumed that it will take four hours to review the notification of the test and the test plan for each respondent.

<sup>f</sup> It is assumed that it will take eight hours to review the test report for each respondent.

<sup>g</sup> The proposed RTR amendments do not impact this item. The current ICR assumes that it will take eight hours to review the notification of compliance status.

<sup>h</sup> The proposed RTR amendments do not impact this item. The current ICR assumes that it will take twelve hours to review semiannual reports.

<sup>i</sup> EPA is proposing the elimination of the startup, shutdown, and malfunction (SSM) exemption in this rule. Compliance with the rule will be required for all record systems in year one.

## Requirements for the Surface Coating of Metal Furniture NESHAP (Requirements)

(C)	(D)	(E)	(F)	(G)	(H)
EPA person-hours per plant per year (C=AxB)	Plants per year <sup>a</sup>	Technical person- hours per year (E=CxD)	Management person-hours per year (F=Ex0.05)	Clerical person-hours per year (G=Ex0.1)	Cost, \$ <sup>b</sup>
0	0	0	0	0	\$0
0	0	0	0	0	\$0
					\$0
4	0	0	0	0	\$0
8	0	0	0	0	\$0
0	0	0	0	0	\$0
0	0	0	0	0	\$0
4	0	0	0	0	\$0
<b>0</b>					<b>\$0</b>

become subject to the rule over the next three years.

Technical rate of \$48.08 (GS-12, Step 1, \$30.05 + 60%), and Clerical rate of \$26.02 (GS-6, schedule, which excludes locality rates of pay. The rates have been increased by 60 percent to

complete the task for each respondent.

initial performance test are used to determine compliance; however, the rule does not require on-going periodic testing or comment on whether performance testing should be required anytime a source plans to undertake an operational activity of significant value.

Identify

Reports, once a year to review the compliance stats for each respondent.

Reports to review the test reports, twice a year for each respondent.

Resources associated with elimination of the SSM exemption include time for evaluating new SSM

**Table 8 - Summary of Annual Agency Burden and Cost of Recordkeeping and Reporting Requirements for the Surface Coating of Metal Furniture NESHAP (Amendments)**

Year	Technical Hours	Management Hours	Clerical Hours	Total Hours	Labor Costs	Non-Labor Costs	Total Costs
1	64	3.2	6.4	74	\$3,500	\$0	\$3,500
2	0	0	0	0	\$0	\$0	\$0
3	0	0	0	0	\$0	\$0	\$0
Total	64	3.2	6.4	74	\$3,500	\$0	\$3,500
Average	21	1.1	2.1	25	\$1,200	\$0	\$1,200

Year	Number of Responses	Total Hours
1	16	74
2	0	0
3	0	0
Total	16	74
Average	5.3	25

(a)

(a) = Average annual additional hours per respondent: 4.6