

Table 1: Annual Respondent Burden and Cost - NESHAP for Metal Coil Surface Coating Plan

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. Applications	N/A		
2. Survey and Studies	N/A		
3. Reporting requirements			
A. Familiarization with the regulatory requirements ^a	4	1	4
B. Required activities			
Initial oxidizer performance test ^c	30	0.07	2.1
Repeat oxidizer performance test ^c	30	0.07	2.1
Initial capture performance test, or review design criteria to ensure capture system meets design criteria for a permanent total enclosure (PTE) ^{c,1}	8	0.07	0.56
Repeat capture performance test ^{c,1}	8	0.07	0.56
Emission rate limit compliance determination	16	12	192
Startup, shutdown, malfunction plan	32	1	32
C. Create information	See 4B		
D. Gather existing information ^k	60	1	60
E. Write Report			
Initial notification	2	1	2
Notification of construction/reconstruction	2	1	2
Notification of anticipated startup	2	1	2
Notification of actual startup	2	1	2
Notification of compliance status	4	1	4
Performance test notification ^c	2	0.07	0.14
Performance test report ^c	40	0.07	2.8
Semiannual report of exceedances ^{d,e}	16	2	32
Semiannual report of no exceedances ^{f,g}	8	2	16
Startup, shutdown, malfunction report ^h	8	2	16
Subtotal for Reporting Requirements			
4. Recordkeeping requirements			
A. Familiarization with the regulatory requirements	See 4B		
B. Plan activities	N/A		
C. Implement Activities	N/A		
D. Develop record system	N/A		
E. Time to enter information			
Records of all information required by standards ⁱ	4	52	208
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 ^j	0.25	2	0.5
I. Time for audits	N/A		

<i>Subtotal for Recordkeeping Requirements</i>			
TOTAL LABOR BURDEN AND COST (rounded)^m			
Total CAPITAL and O&M COST (rounded)^m			
GRAND TOTAL (rounded)^m			

Assumptions:

^a We have assumed that there are approximately 48 respondents, with no additional new or reconstructed sources become burden to re-familiarize themselves with the regulatory requirements each year.

^b This ICR uses the following labor rates: \$149.35 per hour for Executive, Administrative, and Managerial labor; \$112.60 per hour for the United States Department of Labor, Bureau of Labor Statistics, June 2017, "Table 2: Civilian Workers, by Occupation" and increased by 110 percent to account for the benefit packages available to those employed by private industry.

^c This is a one-time startup costs associated with initial compliance determination and acquisition, installation, and utilization. Startup costs were annualized over the 15-year life of control equipment at 7 percent interest. The number of occurrences there are no new sources, no performance tests are expected to occur. It is assumed that the facility would contract out the coordinating and observing the test and reviewing the results.

^d We have assumed that exceedances are reported semiannually.

^e We have assumed that 10 percent of respondents will report exceedances ($48 \times 0.1 = 4.8$, or 5 respondents, when rounded).

^f Reports indicating no exceedances are required semiannually.

^g We have assumed that 90 percent of respondents will report no exceedances ($48 \times 0.9 = 43.2$, or 43 respondents, when rounded).

^h We have assumed that 10 percent of respondents will file a startup, shutdown, malfunction report semiannually ($48 \times 0.1 = 4.8$, or 5 respondents, when rounded).

ⁱ We have assumed that all information is entered on a weekly basis.

^j We have assumed that each of the 48 respondents will take 15 minutes to transmit or disclose information twice a year.

^k Based on comments we received from industry consultation, 60 hrs per respondent is required to gather and evaluate information.

^l We have assumed that emission capture systems meet the design criteria for a permanent total enclosure in EPA Method 9.

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

its (40 CFR Part 63, Subpart SSSS) (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
48	192	9.6	19.2	\$24,178.27
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
48	2,880	144	288	\$362,674.08
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
5	160	8	16	\$20,148.56
43	688	34.4	68.8	\$86,638.81
5	80	4	8	\$10,074.28
	4,600			\$503,714.00
48	9,984	499.2	998.4	\$1,257,270.14
48	24	1.2	2.4	\$3,022.28

	11,509	\$ 1,260,292
	16,100	\$ 1,760,000
		\$ 57,600
	16,100	\$ 1,820,000

ing subject to the rule over the next three years. This ICR assumes each respondent will incur a

98 per hour for Technical labor, and \$54.81 per hour for Clerical labor. These rates are from
 nal and Industry Group.” The rates are from column 1, “Total Compensation.” The rates have

ation of technology and systems needed to support recordkeeping and reporting. The one-time
 per respondent per year is annualized over the 15 year life of the control equipment. Because
 e performance testing costs, but some labor hours from facility staff would be involved with

led).

rounded).

.1 = 4.8, or 5 respondents, when rounded).

ormation in preparation of semiannual reports

l 204, so that capture efficiency does not need to be measured.

ERG Notes

Labor Rates	
149.35	Managerial
112.98	Technical
54.81	Clerical

added respondents to estimate burden for this requirement.

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This is no longer required in the General Provisions, it has been reserved and removed, so removed from this table.

responseHrs/Respondent
106 152

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

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)
Initial performance test	48	0	0
Repeat performance test-retesting preparation	4	0	0
Repeat performance-retesting	48	0	0
Excess emissions enforcement activities	120	1	120
Review reports			
Notification of applicability	2	1	2
Notification of construction/reconstruction	2	1	2
Notification of actual startup	2	1	2
Notification of special compliance requirements	N/A		
Notification of compliance status	2	1	2
Review of initial performance test report	8	1	8
Review of repeat performance test report	8	1	8
Semiannual report of excess emissions ^{c, d}	8	2	16
Semiannual report of no excess emissions ^{e, f}	2	2	4
Review of NESHAP waiver application	N/A		
Review startup, shutdown, malfunction report ^g	2	2	4
TOTAL (rounded)^h			

Assumptions:

^a We have assumed that there are approximately 48 respondents, with no additional new or reconstructed sources becoming tests are expected to occur.

^b This cost is based on the following hourly labor rates increased by 60 percent to account for the benefit packages available Technical (GS-12, Step 1, \$30.05 + 60%) and \$26.02 Clerical (GS-6, Step 3, \$16.26 + 60%). These rates are from the Office pay.

^c It is assumed that 10 percent of respondents will report excess emissions (48 x 0.1 = 4.8, or 5 respondents, when rounded)

^d It is assumed that reports of excess emissions are required semiannually.

^e We have assumed that 90 percent of respondents will report no excess emissions (48 x 0.9 = 43.2, or 43 respondents, when rounded)

^f It is assumed that reports of no excess emissions are required semiannually.

^g We have assumed that 10 percent of respondents will submit startup, shutdown, malfunction reports to be reviewed (48 x 0.1 = 4.8, or 5 respondents, when rounded)

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

ts (40 CFR Part 63, Subpart SSSS) (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	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	0	0	0	\$0
5	80	4	8	\$4,313.76
43	172	8.6	17.2	\$9,274.58
5	20	1	2	\$1,078.44
		313		\$14,700

Labor
64.8
48.08
26.02

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

to government employees: \$64.80 for Managerial (GS-13, Step 5, \$40.50 + 60%), \$48.08 for
of Personnel Management (OPM) “2017 General Schedule” which excludes locality rates of

n rounded).

0.1 = 4.8, or 5 respondents, when rounded).

Rates
Managerial
Technical
Clerical

Assumption: Monitoring Devices

According to industry consultation comment received, the O&M cost to maintain continuous temperature monitoring is \$100 per respondent. The cost covers replacement of temperature sensor each calendar year.

Facility	Number of Lines	Monitoring Device
	48	1 Continuous temperature monitor

Assumption: Stack Testing (Method 25 or 25A)

Costs included for a one-time initial performance test using Method 25 or Method 25A for facilities that all of the existing facilities have conducted an initial performance test.

Facility	Stacks per Facility	Tests Per Year
	0	1

perature measuring monitor is \$1,200

Cost (\$)		Total Cost (\$)
	\$1,200	\$57,600

es with control devices. It is assumed

		EAC w/ 7% Discount (15- year)	Total Cost (\$)
Cost (\$)	\$18,750	\$2,058.65	\$0