

ATTACHMENT 1
SUPPORTING STATEMENT
National Emission Standards for Hazardous Air Pollutants for Boat Manu

TABLES 1, 2, and 3

Annual Respondent Burden and Cost of Recordkeeping and Reporting Requirements for the Boat Manufa

TABLE 4

Summary of Annual Respondent Burden and Cost of Recordkeeping and Reporting Requirements for the

TABLES 5, 6, and 7

Annual Agency Burden and Cost of Recordkeeping and Reporting Requirements for the Boat Manufactur

TABLE 8

Summary of Annual Agency Burden and Cost of Recordkeeping and Reporting Requirements for the Boa

Manufacturing (40 CFR Part 63, Subpart VVVV)

Manufacturing NESHAP Residual Risk and Technology Review – Years 1-3

Boat Manufacturing NESHAP Residual Risk and Technology Review

Manufacturing NESHAP Residual Risk and Technology Review - Year 1-3

Boat Manufacturing NESHAP Residual Risk and Technology Review

Respondent Wages (\$2016)	
Category (1)	Hourly Mean Wage (2)
Technical	\$47.88
Managerial	\$59.33
Clerical	\$21.56

Footnotes:

(1) The Wage categories "Technical," "Clerical," and "Managerial" ref codes 11-3051, 43-6010, and 11-1021, respectively, in the United States Bureau of Labor Statistics table titled "May 2016 National Industry-Specific Employment and Wage Estimates NAICS 336600 - Ship and Boat Building" is available at https://www.bls.gov/oes/current/naics4_336600.htm

(2) Selected "mean hourly wage" in the table referenced in footnote 1. The wages were based on 2015 wages. The wages included: managerial \$65.92 (\$138.43 loaded wage), technical \$47.88 (\$97.55 loaded wage), and clerical \$25.13 (\$52.77 loaded wage).

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

EPA Wages (\$2016)	
Category (1)	Hourly Mean Wage (2)
(GS- 12, step 1) - Technical	\$30.05
(GS- 13, step 5) - Managerial	\$40.50
(GS-6, step 3) - Clerical	\$16.26

Footnotes:

(1) The hourly mean wage for each category is based on 2017 wages, as reported in the OPM Salary Schedule.

(2) This value differs from the wages used in the 2013 ICR amendments because it reflects 2016 rates of pay.

(3) Wage with fringe and overhead is the hourly mean wage increased for the benefit packages available to government employees.

Loaded Wage (3)
\$100.55
\$124.60
\$45.28

er to the labor category
es Department of Labor,
pecific Occupational
lding," found here:

This value differs from
ges used in the 2013 ICR
nical \$50.69 (\$106.45

nt for the benefit

Wage With Fringe & Overhead (3)
\$48.08
\$64.80
\$26.02

and are found here:

[salary-tables/17Tables/htm](#)
ts, which were based on

by 60 percent to account

Table: Annual Respondent Burden and Cost – Boat Manufacturing NESHAP (40 CFR Part 63, Subpart V)

Burden item	(A) Person - hours per occurrence	(B) No. of occurrence per respondent per year
1. Applications	N/A	
2. Surveys and studies	N/A	
3. Familiarize with regulatory requirements ^c	25	1
4. Required activities for sources with add-on control devices ^d		
a. Initial performance test and report	410	1
b. Establish operating parameters	See 4A	
c. Prepare startup, shutdown, and malfunction plan	40	1
5. Required activities for sources using pollution prevention measures ^{e, f}		
a. Develop recordkeeping system		
1) Fiberglass manufacturing operations	22	1
2) Adhesive operations	1	1
3) Aluminum coating operations	6	1
b. Enter information into recordkeeping system		
1) Fiberglass manufacturing operations ^g	84	1
2) Adhesive operations ^h	12	1
3) Aluminum coating operations ⁱ	22	1
c. Work practice requirements ^j	2	12
6. Create information	See 5B	
7. Gather information	See 5B	
8. Notification requirements		
a. Initial notification that existing sources are subject to the standard ^k	24	1
b. Notification for new major sources		
1) Intent to construct and application for approval of construction	80	1
2) Start of construction	2	1
3) Anticipated startup date	2	1
4) Actual startup date	2	1
c. Request for compliance extension	N/A	
d. Notification of special compliance requirements	N/A	
e. Notification of performance tests	2	1
f. Notification of compliance status	4	1
9. Reporting requirements		
a. Semiannual compliance reports for all sources ^l	8	2
b. Additional reports for sources with add-on control devices		
1) Quarterly compliance report for sources with exceedances	16	4
2) Request to return to semiannual compliance reporting ^m	8	1
3) Control device performance test report	See 4A	

4) Operating range for monitored parameters	See 4B	
5) Startup, shutdown, malfunction	8	1
Subtotal for Reporting Requirements		
10. Recordkeeping requirements		
a. Familiarize with regulatory requirements	See 3	
b. Plan and develop record system	See 5A	
c. Record information	See 5B	
d. Records for area sources not subject to the standard	N/A	
11. Time to train personnel	N/A	
12. Time for audits	N/A	
Subtotal for Recordkeeping Requirements		
TOTAL LABOR BURDEN AND COST (rounded)^a		
Capital and O&M Cost (see Section 6(b)(iii))		
GRAND TOTAL (rounded)^a		

Assumptions:

^a We have assumed that the average number of respondents that will be subject to the rule will be 144 existing sources. There

^b This ICR uses the following labor rates: \$138.43 per hour for Executive, Administrative, and Managerial labor; \$106.45 per United States Department of Labor, Bureau of Labor Statistics, September 2012, “Table 2. Civilian Workers, by Occupation” been increased by 110 percent to account for the benefit packages available to those employed by private industry.

^c We have assumed that it will take the same length of time (25 hours) for both fiberglass and aluminum boat manufacturers to

^d We have assumed that sources with add-on control devices will be required to perform initial performance test and report, a

^e We have assumed that all of the existing facilities except for one are complying with the regulations by using pollution prev

^f We have assumed that there will be no new sources expected over the three-year period of this ICR.

^g We have assumed that each of the respondents will take 84 hours to complete the fiberglass manufacturing operations.

^h We have assumed that each respondent will take 12 hours to complete the adhesive operations requirements.

ⁱ We have assumed that 16 respondents will take 22 hours each to complete the aluminum coating operations requirements.

^j We have assumed that 16 respondents will take 2 hours each to complete the work practice requirements.

^k We have assumed that all of the existing respondents will each take 24 hours to complete initial notification requirements.

^l We have assumed that each respondent will take 8 hours two times per year to complete the semiannual compliance report.

^m We have assumed that one respondent will request to return to semiannual compliance reporting.

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

Table: Average Annual EPA Burden and Cost – NESHAP for Boat Manufacturing (40 CFR Part 112)

Activity	(A) EPA Hours per occurrence	(B) No of occurrences per year
1. Read instructions	25	1
2. Enter and update information into agency recordkeeping system ^c	4	1
3. Notification review		
a. Review initial notification for existing sources ^d	2	1
b. Notification for new major sources ^e		
1. Review intent to construct and application to construct	12	1

2. Start of construction	2	1
3. Anticipated startup date	2	1
4. Actual startup date	2	1
c. Review request for compliance extension	N/A	
d. Review special compliance requirements	N/A	
e. Review initial performance test and test plan	20	1
f. Review compliance status ^f	2	1
g. Area sources not subject to standard	N/A	
h. Review waiver application	N/A	
4. Reporting requirements		
a. Semiannual compliance reports for all sources ^g	4	2
b. Reports for sources with add-on control devices		
1. Quarterly compliance report for source with exceedances ^h	4	4
2. Request to return to semiannual compliance reporting ⁱ	4	2
3. Review control device performance test report and operating range	20	1
4. Review startup, shutdown, malfunction reports ^j	4	1
TOTAL LABOR BURDEN AND COST (rounded) ^k		

Assumptions:

^a We have assumed that the average number of respondents that will be subject to the rule will be 144 existing sources. There

^b This cost is based on the following labor rates which incorporates a 1.6 benefits multiplication factor to account for governn Technical rate (GS-12, Step 1, \$28.88 x 1.6), and \$25.76 Clerical rate (GS-6, Step 3, \$15.63 x 1.6). These rates are from the (rates of pay.

^c We have assumed that 144 respondents will each take 4 hours to enter and update information into agency recordkeeping sy

^d We have assumed that all existing sources will be in compliance in the third year.

^e We have assumed that there will be not new sources over the three-year period of this ICR.

^f We have assumed that it will take 2 hours to review the compliance status notification.

^g We have assumed that it will take four hours two times per year to review the semiannual compliance report.

^h we have assumed that 20 percent of the quarterly compliance reports will be reviewed for exceedances.

ⁱ We have assumed that two respondents will request to return to semiannual compliance reporting.

^j We have assumed that it will take 4 hours to review the startup, shutdown, malfunction report.

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

VVV) (Amendments)

(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)	Management person-hours per year (Ex0.05)	Clerical person - hours per year (Ex0.1)	Cost, \$ ^b
25	144	3600	180	360	\$427,135
410	0	0	0	0	\$0
40	0	0	0	0	\$0
22	0	0	0	0	\$0
1	0	0	0	0	\$0
6	0	0	0	0	\$0
84	144	12096	604.8	1209.6	\$1,435,172
12	144	1728	86.4	172.8	\$205,025
22	16	352	17.6	35.2	\$41,764
24	16	384	19.2	38.4	\$45,561
24	0	0	0	0	\$0
80	0	0	0	0	\$0
2	0	0	0	0	\$0
2	0	0	0	0	\$0
2	0	0	0	0	\$0
2	0	0	0	0	\$0
4	0	0	0	0	\$0
16	144	2304	115.2	230.4	\$273,366
64	0	0	0	0	\$0
8	1	8	0.4	0.8	\$949

8	0	0	0	0	\$0
		23,543			\$2,428,972.09
		0			\$0
		23,500			\$2,430,000
					\$800
					\$2,430,000

· will be no additional sources over the three-year period of this ICR.
· hour for Technical labor, and \$52.77 per hour for Clerical labor. These rates are from the
l and Industry group”. The rates are from column 1, “Total Compensation”. The rates have

o review the rules for each facility.
nd to prepare startup, shutdown, and malfunction plan.
ention measures.

63, Subpart VVVV) (Renewal)

(C) EPA hours per year (C=AxB)	(D) Facilities per year ^a	(E) Technical hours per year (E=CxD)	(F) Managerial hours per year (E x 0.05)	(G) Clerical hours per year (E x 0.1)	(H) Total Cost per Year ^a
25	0	0	0	0	\$0
4	144	576	28.8	57.6	\$30,760.70
2	0	0	0	0	\$0
12	0	0	0	0	\$0

2	0	0	0	0	\$0
2	0	0	0	0	\$0
2	0	0	0	0	\$0
20	0	0	0	0	\$0
2	144	288	14.4	28.8	\$15,380.35
8	144	1,152	57.6	115.2	\$61,521.41
					\$0
16	0	0	0	0	\$0
8	1	8	0.4	0.8	\$427.23
20	1	20	1	2	\$1,068.08
4	1	4	0.2	0.4	\$213.62
			2,360		\$109,400

will be no additional sources over the three-year period of this ICR.

ment overhead expenses: \$64.16 Managerial rate (GS-13, Step 5, \$38.92 x 1.6), \$47.62
Office of Personnel Management (OPM) "2012 General Schedule", which excludes locality

stem.

2013 ICR Wages	
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Technical	\$106.45
Managerial	\$138.43
Clerical	\$52.77

2013 ICR Wages

Technical	\$47.62
Managerial	\$64.16
Clerical	\$25.76

Table 1 : Annual Respondent Burden and Cost Year One – Boat Manufacturing NESHAP (40 CFR Part 63)

Burden item	(A) Person - hours per occurrence	(B) No. of occurrence per respondent per year
1. Applications	N/A	
2. Surveys and studies	N/A	
3. Familiarize with regulatory requirements ^c	4	1
4. Required activities for sources with add-on control devices ^d		
a. Initial performance test and report ^h	N/A	
b. Establish operating parameters ^h	N/A	
c. Re-evaluating startup, shutdown, and amlfuction requirements	4	1
5. Required activities for sources using pollution prevention measures		
a. Develop recordkeeping system ^h	See 10.a.	
b. Enter information into recordkeeping system	See 5.c.	
c. Work practice requirements ^e	4	12
6. Create information	See 5.c.	
7. Gather information	See 5.c.	
Subtotal for Reporting Requirements		
8. Notification requirements		
a. Initial notification that existing sources are subject to the standard ^h	N/A	
b. Notification for new major sources ^h	N/A	
c. Request for compliance extension ^h	N/A	
d. Notification of special compliance requirements ^h	N/A	
e. Notification of performance tests ^e	N/A	
f. Notification of compliance status ^h	N/A	
9. Reporting requirements		
a. Semiannual compliance reports for all sources ^f	8	2
b. Additional reports for sources with add-on control devices ^e	N/A	
10. Recordkeeping requirements		
a. Familiarize with CEDRI and CDX registration	4	1
b. Plan and develop record system	See 10.a.	
c. Record information	6	1
d. Records for area sources not subject to the standard	N/A	
11. Time to train personnel	See 10.a.	
12. Time for audits	N/A	
Subtotal for Recordkeeping Requirements		
TOTAL LABOR BURDEN AND COST		
Capital and O&M Cost (see Section 6(b)(iii))		
GRAND TOTAL (rounded)^g		

Assumptions:

- ^a We have assumed that the average number of respondents that will be subject to the rule will be 93 existing sources. There v
- ^b This ICR uses the following labor rates: \$124.59 per hour for Executive, Administrative, and Managerial labor; \$100.55 per United States Department of Labor, Bureau of Labor Statistics, May 2016, “May 2016 National Industry-Specific Occupatio are from column 1, “Total Compensation”. The rates have been increased by 110 percent to account for the benefit packages
- ^c We have assumed that it will take the same length of time (4 hours) for both fiberglass and aluminum boat manufacturers to
- ^d We have assumed that facilities will require some time to evaluate the effect of the rule removing the SSM exemption, and :
- ^e We have assumed that all of the existing facilities are complying with the regulations by using pollution prevention measure
- ^f We have assumed that each respondent will take 8 hours two times per year to complete the semiannual compliance report.
- ^g Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding
- ^h We have assumed that no new facilities will become operational in the next three years.

will be no additional sources over the three-year period of this ICR.

hour for Technical labor, and \$45.28 per hour for Clerical labor. These rates are from the "2014 Bureau of Labor Statistics Employment and Wage Estimates NAICS 336600 – Ship and Boat Building". The rates are available to those employed by private industry.

review the final RTR rules for each facility.

adjusting recordkeeping and reporting to accommodate these changes.

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2013 ICR Wages	
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Technical	\$106.45
Managerial	\$138.43
Clerical	\$52.77

Table 2 : Annual Respondent Burden and Cost Year Two – Boat Manufacturing NESHAP (40 CFR Part 6)

Burden item	(A) Person - hours per occurrence	(B) No. of occurrence per respondent per year
1. Applications	N/A	
2. Surveys and studies	N/A	
3. Familiarize with regulatory requirements ^c	0	1
4. Required activities for sources with add-on control devices ^d		
a. Initial performance test and report ^h	N/A	
b. Establish operating parameters ^h	N/A	
c. Re-evaluating startup, shutdown, and amlfuction requirements	0	1
5. Required activities for sources using pollution prevention measures		
a. Develop recordkeeping system ^h	See 10.a.	
b. Enter information into recordkeeping system	See 5.c.	
c. Work practice requirements ^e	4	12
6. Create information	See 5.c.	
7. Gather information	See 5.c.	
Subtotal for Reporting Requirements		
8. Notification requirements		
a. Initial notification that existing sources are subject to the standard ^h	N/A	
b. Notification for new major sources ^h	N/A	
c. Request for compliance extension ^h	N/A	
d. Notification of special compliance requirements ^h	N/A	
e. Notification of performance tests ^e	N/A	
f. Notification of compliance status ^h	N/A	
9. Reporting requirements		
a. Semiannual compliance reports for all sources ^f	8	2
b. Additional reports for sources with add-on control devices ^e	N/A	
10. Recordkeeping requirements		
a. Familiarize with CEDRI and CDX registration	0	1
b. Plan and develop record system	See 10.a.	
c. Record information	6	1
d. Records for area sources not subject to the standard	N/A	
11. Time to train personnel	See 10.a.	
12. Time for audits	N/A	
Subtotal for Recordkeeping Requirements		
TOTAL LABOR BURDEN AND COST		
Capital and O&M Cost (see Section 6(b)(iii))		
GRAND TOTAL (rounded)^g		

Assumptions:

- ^a We have assumed that the average number of respondents that will be subject to the rule will be 93 existing sources. There v
- ^b This ICR uses the following labor rates: \$124.59 per hour for Executive, Administrative, and Managerial labor; \$100.55 per United States Department of Labor, Bureau of Labor Statistics, May 2016, “May 2016 National Industry-Specific Occupatio are from column 1, “Total Compensation”. The rates have been increased by 110 percent to account for the benefit packages
- ^c We have assumed that it will take the same length of time (4 hours) for both fiberglass and aluminum boat manufacturers to
- ^d We have assumed that facilities will require some time to evaluate the effect of the rule removing the SSM exemption, and :
- ^e We have assumed that all of the existing facilities are complying with the regulations by using pollution prevention measure
- ^f We have assumed that each respondent will take 8 hours two times per year to complete the semiannual compliance report.
- ^g Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding
- ^h We have assumed that no new facilities will become operational in the next three years.

3, Subpart VVVV) (2018 RTR)

(C) Person- hours per respondent per year (C=AxB)	(D) Respondents per year ^a	(E) Technical Person - hours per year (E=CxD)	(F) Managemen t person- hours per year (Ex0.05)	(G) Clerical person - hours per year (Ex0.1)	(H) Cost, \$ ^b
0	92	0	0	0	\$0
0	92	0	0	0	\$0
48	92	4416	220.8	441.6	\$523,952
			5,078		\$523,951.78
16	92	1472	73.6	147.2	\$174,651
0	92	0	0	0	\$0
6	92	552	27.6	55.2	\$65,494
			2,328		\$240,145
			7,406		\$764,096
					\$0
					\$764,000

will be no additional sources over the three-year period of this ICR.

hour for Technical labor, and \$45.28 per hour for Clerical labor. These rates are from the "2014 Bureau of Labor Statistics Employment and Wage Estimates NAICS 336600 – Ship and Boat Building". The rates are available to those employed by private industry.

review the final RTR rules for each facility.

adjusting recordkeeping and reporting to accommodate these changes.

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2013 ICR Wages	
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Technical	\$106.45
Managerial	\$138.43
Clerical	\$52.77

Table 3 : Annual Respondent Burden and Cost Year Three – Boat Manufacturing NESHAP (40 CFR Part

Burden item	(A) Person - hours per occurrence	(B) No. of occurrence per respondent per year
1. Applications	N/A	
2. Surveys and studies	N/A	
3. Familiarize with regulatory requirements ^c	0	1
4. Required activities for sources with add-on control devices ^d		
a. Initial performance test and report ^h	N/A	
b. Establish operating parameters ^h	N/A	
c. Re-evaluating startup, shutdown, and amlfuction requirements	0	1
5. Required activities for sources using pollution prevention measures		
a. Develop recordkeeping system ^h	See 10.a.	
b. Enter information into recordkeeping system	See 5.c.	
c. Work practice requirements ^e	4	12
6. Create information	See 5.c.	
7. Gather information	See 5.c.	
Subtotal for Reporting Requirements		
8. Notification requirements		
a. Initial notification that existing sources are subject to the standard ^h	N/A	
b. Notification for new major sources ^h	N/A	
c. Request for compliance extension ^h	N/A	
d. Notification of special compliance requirements ^h	N/A	
e. Notification of performance tests ^e	N/A	
f. Notification of compliance status ^h	N/A	
9. Reporting requirements		
a. Semiannual compliance reports for all sources ^f	8	2
b. Additional reports for sources with add-on control devices ^e	N/A	
10. Recordkeeping requirements		
a. Familiarize with CEDRI and CDX registration	0	1
b. Plan and develop record system	See 10.a.	
c. Record information	6	1
d. Records for area sources not subject to the standard	N/A	
11. Time to train personnel	See 10.a.	
12. Time for audits	N/A	
Subtotal for Recordkeeping Requirements		
TOTAL LABOR BURDEN AND COST		
Capital and O&M Cost (see Section 6(b)(iii))		
GRAND TOTAL (rounded)^g		

Assumptions:

- ^a We have assumed that the average number of respondents that will be subject to the rule will be 93 existing sources. There v
- ^b This ICR uses the following labor rates: \$124.59 per hour for Executive, Administrative, and Managerial labor; \$100.55 per United States Department of Labor, Bureau of Labor Statistics, May 2016, “May 2016 National Industry-Specific Occupatio are from column 1, “Total Compensation”. The rates have been increased by 110 percent to account for the benefit packages
- ^c We have assumed that it will take the same length of time (4 hours) for both fiberglass and aluminum boat manufacturers to
- ^d We have assumed that facilities will require some time to evaluate the effect of the rule removing the SSM exemption, and :
- ^e We have assumed that all of the existing facilities are complying with the regulations by using pollution prevention measure
- ^f We have assumed that each respondent will take 8 hours two times per year to complete the semiannual compliance report.
- ^g Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding
- ^h We have assumed that no new facilities will become operational in the next three years.

63, Subpart VVVV (2018 RTR)

(C) Person-hours per respondent per year (C=AxB)	(D) Respondents per year ^a	(E) Technical Person - hours per year (E=CxD)	(F) Management person-hours per year (Ex0.05)	(G) Clerical person - hours per year (Ex0.1)	(H) Cost, \$ ^b
0	92	0	0	0	\$0
0	92	0	0	0	\$0
48	92	4416	220.8	441.6	\$523,952
		5,078			\$523,951.78
16	92	1472	73.6	147.2	\$174,651
0	92	0	0	0	\$0
6	92	552	27.6	55.2	\$65,494
		2,328			\$240,145
		7,406			\$764,096
					\$0
					\$764,000

will be no additional sources over the three-year period of this ICR.

hour for Technical labor, and \$45.28 per hour for Clerical labor. These rates are from the "2014 Bureau of Labor Statistics Employment and Wage Estimates NAICS 336600 – Ship and Boat Building". The rates are available to those employed by private industry.

review the final RTR rules for each facility.

adjusting recordkeeping and reporting to accommodate these changes.

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2013 ICR Wages	
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Technical	\$106.45
Managerial	\$138.43
Clerical	\$52.77

Table 4 - Summary of Annual Respondent Burden and Cost of Recordkeeping and Reporting Requi

Year	Technical Hours	Management Hours	Clerical Hours	Total Labor Hours	Labor Costs	Non-Labor (Capital/Startup and O&M) Costs
1	7,544	377	754	8,676	\$895,084	\$0
2	6,440	322	644	7,406	\$764,096	\$0
3	6,440	322	644	7,406	\$764,096	\$0
Total	20,424	1,021	2,042	23,488	\$2,423,276	\$0
Average	6,808	340	681	7,829	\$807,800	\$0

Requirements for the Boat Manufacturing NESHAP (2018 RTR)

Total Costs
\$895,000
\$764,000
\$764,000
\$2,423,000
\$808,000

Table 5: Average Annual EPA Burden and Cost Year One – NESHAP for Boat Manufacturing (4)

Activity	(A) EPA Hours per occurrence	(B) No of occurrences per year
1. Read instructions	N/A	
2. Enter and update information into agency recordkeeping system ^c	4	1
3. Notification review ^d		
a. Review initial notification for existing sources	N/A	
b. Notification for new major sources ^e	N/A	
c. Review request for compliance extension	N/A	
d. Review special compliance requirements	N/A	
e. Review initial performance test and test plan	N/A	
f. Review compliance status ^f	2	1
g. Area sources not subject to standard	N/A	
h. Review waiver application	N/A	
4. Reporting requirements		
a. Semiannual compliance reports for all sources ^g	4	2
TOTAL LABOR BURDEN AND COST (rounded) ^h		

Assumptions:

^a We have assumed that the average number of respondents that will be subject to the rule will be 93 existing sources. There v

^b This cost is based on the following labor rates which incorporates a 1.6 benefits multiplication factor to account for governn Clerical rate. These rates are from the Office of Personnel Management (OPM) “2017 General Schedule”, which excludes loc

^c We have assumed that 144 respondents will each take 4 hours to enter and update information into agency recordkeeping sy

^d We have assumed that all existing sources will be in compliance in year one.

^e We have assumed that there will be not new sources over the three-year period of this ICR.

^f We have assumed that it will take 2 hours to review the compliance status notification.

^g We have assumed that it will take four hours two times per year to review the semiannual compliance report.

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

30 CFR Part 63, Subpart VVVV) (2018 RTR)

(C) EPA hours per year (C=AxB)	(D) Facilities per year ^a	(E) Technical hours per year (E=CxD)	(F) Managerial hours per year (E x 0.05)	(G) Clerical hours per year (E x 0.1)	(H) Total Cost per Year ^a
4	92	576	28.8	57.6	\$30,760.70
2	92	288	14.4	28.8	\$15,380.35
8	92	1,152	57.6	115.2	\$61,521.41
		2,320			\$107,700

will be no additional sources over the three-year period of this ICR.

ment overhead expenses: \$64.80 Managerial rate, \$48.08 Technical rate, and \$26.02
ality rates of pay.

stem.

2013 ICR Wages	
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Technical	\$47.62
Managerial	\$64.16
Clerical	\$25.76

Table 6: Average Annual EPA Burden and Cost Year Two – NESHAP for Boat Manufacturing (4

Activity	(A) EPA Hours per occurrence	(B) No of occurrences per year
1. Read instructions	N/A	
2. Enter and update information into agency recordkeeping system ^c	4	1
3. Notification review ^d		
a. Review initial notification for existing sources	N/A	
b. Notification for new major sources ^e	N/A	
c. Review request for compliance extension	N/A	
d. Review special compliance requirements	N/A	
e. Review initial performance test and test plan	N/A	
f. Review compliance status ^f	2	1
g. Area sources not subject to standard	N/A	
h. Review waiver application	N/A	
4. Reporting requirements		
a. Semiannual compliance reports for all sources ^g	4	2
TOTAL LABOR BURDEN AND COST (rounded) ^h		

Assumptions:

^a We have assumed that the average number of respondents that will be subject to the rule will be 93 existing sources. There v

^b This cost is based on the following labor rates which incorporates a 1.6 benefits multiplication factor to account for governn Clerical rate. These rates are from the Office of Personnel Management (OPM) “2017 General Schedule”, which excludes loc

^c We have assumed that 144 respondents will each take 4 hours to enter and update information into agency recordkeeping sy

^d We have assumed that all existing sources will be in compliance in year one.

^e We have assumed that there will be not new sources over the three-year period of this ICR.

^f We have assumed that it will take 2 hours to review the compliance status notification.

^g We have assumed that it will take four hours two times per year to review the semiannual compliance report.

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

0 CFR Part 63, Subpart VVVV) (2018 RTR)

(C) EPA hours per year (C=AxB)	(D) Facilities per year ^a	(E) Technical hours per year (E=CxD)	(F) Managerial hours per year (E x 0.05)	(G) Clerical hours per year (E x 0.1)	(H) Total Cost per Year ^a
4	92	576	28.8	57.6	\$30,760.70
2	92	288	14.4	28.8	\$15,380.35
8	92	1,152	57.6	115.2	\$61,521.41
		2,320			\$107,700

will be no additional sources over the three-year period of this ICR.

ment overhead expenses: \$64.80 Managerial rate, \$48.08 Technical rate, and \$26.02
ality rates of pay.

stem.

2013 ICR Wages	
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Technical	\$47.62
Managerial	\$64.16
Clerical	\$25.76

Table 7: Average Annual EPA Burden and Cost Year Three – NESHAP for Boat Manufacturing (

Activity	(A) EPA Hours per occurrence	(B) No of occurrences per year
1. Read instructions	N/A	
2. Enter and update information into agency recordkeeping system ^c	4	1
3. Notification review ^d		
a. Review initial notification for existing sources	N/A	
b. Notification for new major sources ^e	N/A	
c. Review request for compliance extension	N/A	
d. Review special compliance requirements	N/A	
e. Review initial performance test and test plan	N/A	
f. Review compliance status ^f	2	1
g. Area sources not subject to standard	N/A	
h. Review waiver application	N/A	
4. Reporting requirements		
a. Semiannual compliance reports for all sources ^g	4	2
TOTAL LABOR BURDEN AND COST (rounded) ^h		

Assumptions:

^a We have assumed that the average number of respondents that will be subject to the rule will be 93 existing sources. There v

^b This cost is based on the following labor rates which incorporates a 1.6 benefits multiplication factor to account for governn Clerical rate. These rates are from the Office of Personnel Management (OPM) “2017 General Schedule”, which excludes loc

^c We have assumed that 144 respondents will each take 4 hours to enter and update information into agency recordkeeping sy

^d We have assumed that all existing sources will be in compliance in year one.

^e We have assumed that there will be not new sources over the three-year period of this ICR.

^f We have assumed that it will take 2 hours to review the compliance status notification.

^g We have assumed that it will take four hours two times per year to review the semiannual compliance report.

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

40 CFR Part 63, Subpart VVVV) (2018 RTR)

(C) EPA hours per year (C=AxB)	(D) Facilities per year ^a	(E) Technical hours per year (E=CxD)	(F) Managerial hours per year (E x 0.05)	(G) Clerical hours per year (E x 0.1)	(H) Total Cost per Year ^a
4	92	576	28.8	57.6	\$30,760.70
2	92	288	14.4	28.8	\$15,380.35
8	92	1,152	57.6	115.2	\$61,521.41
		2,320			\$107,700

will be no additional sources over the three-year period of this ICR.

ment overhead expenses: \$64.80 Managerial rate, \$48.08 Technical rate, and \$26.02
ality rates of pay.

stem.

2013 ICR Wages	
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Technical	\$47.62
Managerial	\$64.16
Clerical	\$25.76

Table 8 - Summary of Annual Agency Burden and Cost of Recordkeeping and Reporting

Year	Technical Hours	Management Hours	Clerical Hours	Total Hours	Labor Costs	Non-Labor Costs
1	2,016	101	202	2,318	\$107,700	\$0
2	2,016	101	202	2,318	\$107,700	\$0
3	2,016	101	202	2,318	\$107,700	\$0
Total	6,048	302	605	6,955	\$323,100	\$0
Average	2,016	101	202	2,318	\$107,700	\$0

Requirements for the Boat Manufacturing NESHAP (2018 RTR)

Total Costs
\$107,700
\$107,700
\$107,700
\$323,100
\$107,700