

**Table 1: Annual Respondent Burden and Cost - NESHAP for Miscellaneous Coating Manufactu  
HHHHH) (Amendments)**

**Year 1**

Burden item	(A) Person hours per occurrence	(B) No. of occurrences per respondent per year	(C) Person hours per respondent per year (AxB)	(D) Respondent s per year <sup>a</sup>	(E) Technical person- hours per year (CxD)
1. Applications	N/A				
2. Survey and Studies	N/A				
3. Reporting Requirements					
A. Familiarization with the regulatory requirements	4	1	4	43	172
B. Required Activities					
Add-on control performance test <sup>c</sup>	30	1	30	0	0
Repeat add-on control performance test <sup>c</sup>	30	1	30	0	0
Initial CMS performance evaluation <sup>d</sup>	10	1	10	0	0
Create Information	See 4				
Gather Existing Information	See 4				
C. Write Reports					
Notification of construction/reconstruction	2	1	2	0	0
Notification of anticipated startup	2	1	2	0	0
Notification of actual startup	2	1	2	0	0
Notification of applicability of standard					
i. Existing sources	2	0	0	0	0
ii. New sources	2	1	2	0	0
Emissions averaging plan <sup>e</sup>	40	1	40	0	0
Pre-compliance report <sup>f</sup>	40	1	40	0	0
Notification of performance test/re-test <sup>g</sup>	2	1	2	0	0
Performance test/re-test report <sup>g</sup>	10	1	10	0	0
Notification of initial CMS performance evaluation <sup>d</sup>	2	1	1	0	0
Notification of compliance status <sup>g</sup>					
i. With performance test	80	1	80	0	0
ii. Without performance test	120	1	120	0	0
Notification of process change <sup>h</sup>	8	1	8	0	0
Semi-annual compliance report - no deviations <sup>i</sup>	4	2	8	0	0
Semi-annual compliance report - with deviations <sup>i</sup>	12	2	24	0	0
Startup, shutdown, and malfunction report <sup>j</sup>	8	1	8	0	0
LDAR report <sup>k</sup>	125	2	250	0	0
Emissions averaging report <sup>l</sup>	20	1	20	0	0
<b>Subtotal for Reporting Requirements</b>					
4. Recordkeeping requirements					
A. Familiarization with the regulatory requirements	See 3A				
B. Plan activities	N/A				
C. Implement Activities	N/A				
D. Develop record system <sup>m</sup>	40	1	40	0	0
E. Develop startup, shutdown, malfunction plan <sup>n</sup>	100	1	100	0	0

F. Develop QA/QC Plan for CMS <sup>o</sup>	40	1	40	0	0
G. Time to enter information					
i. Records of startup, shutdown, and malfunction	1.5	1	1.5	0	0
ii. Records of CMS data					
a. Record continuously monitored parameters	1	365	365	0	0
b. Compile data	24	2	48	0	0
c. Information for semi-annual reports	16	2	32	0	0
d. LDAR recordkeeping	See 3C				
iii. Records of operating hours and add-on control bypass hours per semiannual compliance period	0.5	2	1	23	23
H. Calibration of CMS	376	1	376	0	0
I. Time to train personnel <sup>p</sup>	40	1	40	0	0
J. Refresher course <sup>q</sup>	16	1	16	0	0
K. Time for audits	N/A				0
L. Revise record systems due to SSM revisions <sup>t</sup>	8	1	8	43	344
M. Become familiar with CEDRI for electronic filing of notifications and reports <sup>s</sup>	8	1	8	43	344
<b>Subtotal for Recordkeeping Requirements</b>					
<b>Total Labor Burden and Costs (rounded) <sup>t</sup></b>					
<b>Total Capital and O&amp;M Cost (rounded) <sup>t</sup></b>					
<b>Grand Total (rounded) <sup>t</sup></b>					

**Assumptions:**

- <sup>a</sup> There are 43 existing major source facilities subject to the NESHAP. We assume no new sources will become subject during the three-year period.
- <sup>b</sup> This ICR uses the following labor rates: \$147.40 per hour for Executive, Administrative, and Managerial labor; \$117.92 per hour for Technical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, June 2018, "Table 2: Civilian Workers, by Occupation, Sex, Race, and Hispanic or Latino Ethnicity." The rates have been increased by 110 percent to account for the benefit packages available to workers.
- <sup>c</sup> 23 facilities have add-on controls for compliance. The performance test will affect 12 facilities in the third year. These facilities do not have permits.
- <sup>d</sup> Assumes 10 hours to conduct a CMS performance evaluation and 2 hours to prepare a notification.
- <sup>e</sup> Assumes that all existing facilities have complied with the emissions averaging requirements; new facilities are not allowed to use emissions averaging.
- <sup>f</sup> Assumes 50 percent of the new facilities will submit a pre-compliance report.
- <sup>g</sup> Assumes that the 12 facilities without periodic testing requirements in their permits will do performance testing in year 3. Assume a 5% deviation rate. Assumes all other facilities will comply by submitting engineering calculations and design calculations.
- <sup>h</sup> Assumes 10 percent of the facilities will implement process changes.
- <sup>i</sup> Assumes 10 percent will have deviations.
- <sup>j</sup> Assumes 5% of all facilities will report actions taken during a startup, shutdown, or malfunction is not consistent with the plan.
- <sup>k</sup> Assumes all facilities will be subject to the equipment leak standards with an average of 125 hours per report.
- <sup>l</sup> Assumes that 10 percent of existing facilities will use with the emissions averaging reports to comply.
- <sup>m</sup> Assumes 40 hours to develop a record system for recording parameter monitoring information.
- <sup>n</sup> Assumes 80 hours to draft the startup, shutdown, and malfunction plan and another 20 hours of review/revisions, for a total of 100 hours.
- <sup>o</sup> Assumes 40 hours to develop/review the QA/QC plan for the CMS. No QA/QC plan is required for the parameter monitoring systems.
- <sup>p</sup> Assumes no facilities will use the alternative standard, which requires CEMS and QA/QC plans.
- <sup>q</sup> Assumes 40 hours to train personnel and 16 hours for an annual refresher course.

- <sup>r</sup> We assume that costs associated with elimination of the SSM exemption include time for re-evaluating previously developed
- <sup>s</sup> Responses in year one associated with the use of electronic reporting include becoming familiar with CEDRI and the semi
- <sup>t</sup> Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.



0	0	\$0
0	0	\$0
0	0	\$0
0	0	\$0
0	0	\$0
1.15	2.3	\$3,013
0	0.0	\$0
0	0	\$0
0	0	\$0
0	0	\$0
17.2	34.4	\$45,061.25
17.2	34.4	\$45,061.25
<b>818</b>		<b>\$93,135</b>
<b>1,000</b>		<b>\$116,000</b>
		<b>\$0</b>
		<b>\$116,000</b>

year period of this ICR.

technical labor, and \$57.02 per hour for Clerical  
Occupational and Industry Group.” The rates  
those employed by private industry.

already have a testing requirement in their

sions averaging.

failure and re-test rate (12 x 0.05 = 0.6).

s.

included in the rule.

ed SSM record systems in year one. Costs  
i-annual reporting form.

**Table 2: Annual Respondent Burden and Cost - NESHAP for Miscellaneous Coating Manufactu  
HHHHH) (Amendments)**

**Year 2**

Burden item	(A) Person hours per occurrence	(B) No. of occurrences per respondent per year	(C) Person hours per respondent per year (AxB)	(D) Respondent s per year <sup>a</sup>	(E) Technical person- hours per year (CxD)
1. Applications	N/A				
2. Survey and Studies	N/A				
3. Reporting Requirements					
A. Familiarization with the regulatory requirements	4	1	4	0	0
B. Required Activities					
Add-on control performance test <sup>c</sup>	30	1	30	0	0
Repeat add-on control performance test <sup>c</sup>	30	1	30	0	0
Initial CMS performance evaluation <sup>d</sup>	10	1	10	0	0
Create Information	See 4				
Gather Existing Information	See 4				
C. Write Reports					
Notification of construction/reconstruction	2	1	2	0	0
Notification of anticipated startup	2	1	2	0	0
Notification of actual startup	2	1	2	0	0
Notification of applicability of standard					
i. Existing sources	2	0	0	0	0
ii. New sources	2	1	2	0	0
Emissions averaging plan <sup>e</sup>	40	1	40	0	0
Pre-compliance report <sup>f</sup>	40	1	40	0	0
Notification of performance test/re-test <sup>g</sup>	2	1	2	0	0
Performance test/re-test report <sup>g</sup>	10	1	10	0	0
Notification of initial CMS performance evaluation <sup>d</sup>	2	1	1	0	0
Notification of compliance status <sup>g</sup>					
i. With performance test	80	1	80	0	0
ii. Without performance test	120	1	120	0	0
Notification of process change <sup>h</sup>	8	1	8	0	0
Semi-annual compliance report - no deviations <sup>i</sup>	4	2	8	0	0
Semi-annual compliance report - with deviations <sup>i</sup>	12	2	24	0	0
Startup, shutdown, and malfunction report <sup>j</sup>	8	1	8	0	0
LDAR report <sup>k</sup>	125	2	250	0	0
Emissions averaging report <sup>l</sup>	20	1	20	0	0
<b>Subtotal for Reporting Requirements</b>					
4. Recordkeeping requirements					
A. Familiarization with the regulatory requirements	See 3A				
B. Plan activities	N/A				
C. Implement Activities	N/A				
D. Develop record system <sup>m</sup>	40	1	40	0	0
E. Develop startup, shutdown, malfunction plan <sup>n</sup>	100	1	100	0	0

F. Develop QA/QC Plan for CMS <sup>o</sup>	40	1	40	0	0
G. Time to enter information					
i. Records of startup, shutdown, and malfunction	1.5	1	1.5	0	0
ii. Records of CMS data					
a. Record continuously monitored parameters	1	365	365	0	0
b. Compile data	24	2	48	0	0
c. Information for semi-annual reports	16	2	32	0	0
d. LDAR recordkeeping	See 3C				
iii. Records of operating hours and bypass hours per semiannual compliance period	0.5	2	1	23	23
H. Calibration of CMS	376	1	376	0	0
I. Time to train personnel <sup>p</sup>	40	1	40	0	0
J. Refresher course <sup>q</sup>	16	1	16	0	0
K. Time for audits	N/A				0
L. Revise record systems due to SSM revisions <sup>t</sup>	8	1	8	0	0
M. Become familiar with CEDRI for electronic filing of notifications and reports <sup>s</sup>	8	1	8	0	0
<b>Subtotal for Recordkeeping Requirements</b>					
<b>Total Labor Burden and Costs (rounded) <sup>t</sup></b>					
<b>Total Capital and O&amp;M Cost (rounded) <sup>t</sup></b>					
<b>Grand Total (rounded) <sup>t</sup></b>					

#### Assumptions:

<sup>a</sup> There are 43 existing major source facilities subject to the NESHAP. We assume no new sources will become subject during the three-

<sup>b</sup> This ICR uses the following labor rates: \$147.40 per hour for Executive, Administrative, and Managerial labor; \$117.92 per hour for T labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, June 2018, "Table 2: Civilian Workers, by are from column 1, "Total Compensation." The rates have been increased by 110 percent to account for the benefit packages available to

<sup>c</sup> 23 facilities have add-on controls for compliance. The performance test will affect 12 facilities in the third year. These facilities do not have permits.

<sup>d</sup> Assumes 10 hours to conduct a CMS performance evaluation and 2 hours to prepare a notification.

<sup>e</sup> Assumes that all existing facilities have complied with the emissions averaging requirements; new facilities are not allowed to use emis-

<sup>f</sup> Assumes 50 percent of the new facilities will submit a pre-compliance report.

<sup>g</sup> Assumes that the 12 facilities without periodic testing requirements in their permits will do performance testing in year 3. Assume a 5% Assumes all other facilities will comply by submitting engineering calculations and design calculations.

<sup>h</sup> Assumes 10 percent of the facilities will implement process changes.

<sup>i</sup> Assumes 10 percent will have deviations.

<sup>j</sup> Assumes 5% of all facilities will report actions taken during a startup, shutdown, or malfunction is not consistent with the plan.

<sup>k</sup> Assumes all facilities will be subject to the equipment leak standards with an average of 125 hours per report.

<sup>l</sup> Assumes that 10 percent of existing facilities will use with the emissions averaging reports to comply.

<sup>m</sup> Assumes 40 hours to develop a record system for recording parameter monitoring information.

<sup>n</sup> Assumes 80 hours to draft the startup, shutdown, and malfunction plan and another 20 hours of review/revisions, for a total of 100 hour

<sup>o</sup> Assumes 40 hours to develop/review the QA/QC plan for the CMS. No QA/QC plan is required for the parameter monitoring systems i

<sup>p</sup> Assumes no facilities will use the alternative standard, which requires CEMS and QA/QC plans.

<sup>q</sup> Assumes 40 hours to train personnel and 16 hours for an annual refresher course.

- <sup>r</sup> We assume that costs associated with elimination of the SSM exemption include time for re-evaluating previously developed
- <sup>s</sup> Responses in year one associated with the use of electronic reporting include becoming familiar with CEDRI and the semi
- <sup>t</sup> Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.



0	0	\$0
0	0	\$0
0	0	\$0
0	0	\$0
0	0	\$0
1.15	2.3	\$3,013
0	0.0	\$0
0	0	\$0
0	0	\$0
0	0	\$0
0	0	\$0
0	0	\$0
0	0	\$0
<b>26</b>		<b>\$3,013</b>
<b>0</b>		<b>\$3,000</b>
		<b>\$0</b>
		<b>\$3,000</b>

year period of this ICR.

technical labor, and \$57.02 per hour for Clerical  
Occupational and Industry Group.” The rates  
those employed by private industry.

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failure and re-test rate (12 x 0.05 = 0.6).

s.

included in the rule.

ed SSM record systems in year one. Costs  
i-annual reporting form.

**Table 3: Annual Respondent Burden and Cost - NESHAP for Miscellaneous Coating Manufactu  
HHHHH) (Amendments)**

**Year 3**

Burden item	(A) Person hours per occurrence	(B) No. of occurrences per respondent per year	(C) Person hours per respondent per year (AxB)	(D) Respondent s per year <sup>a</sup>	(E) Technical person- hours per year (CxD)
1. Applications	N/A				
2. Survey and Studies	N/A				
3. Reporting Requirements					
A. Familiarization with the regulatory requirements	4	1	4	0	0
B. Required Activities					
Add-on control performance test <sup>c</sup>	30	1	30	12	360
Repeat add-on control performance test <sup>c</sup>	30	1	30	1	30
Initial CMS performance evaluation <sup>d</sup>	10	1	10	0	0
Create Information	See 4				
Gather Existing Information	See 4				
C. Write Reports					
Notification of construction/reconstruction	2	1	2	0	0
Notification of anticipated startup	2	1	2	0	0
Notification of actual startup	2	1	2	0	0
Notification of applicability of standard					
i. Existing sources	2	0	0	0	0
ii. New sources	2	1	2	0	0
Emissions averaging plan <sup>e</sup>	40	1	40	0	0
Pre-compliance report <sup>f</sup>	40	1	40	0	0
Notification of performance test/re-test <sup>g</sup>	2	1	2	13	26
Performance test/re-test report <sup>g</sup>	10	1	10	13	130
Notification of initial CMS performance evaluation <sup>d</sup>	2	1	1	0	0
Notification of compliance status <sup>g</sup>					
i. With performance test	80	1	80	0	0
ii. Without performance test	120	1	120	0	0
Notification of process change <sup>h</sup>	8	1	8	0	0
Semi-annual compliance report - no deviations <sup>i</sup>	4	2	8	0	0
Semi-annual compliance report - with deviations <sup>i</sup>	12	2	24	0	0
Startup, shutdown, and malfunction report <sup>j</sup>	8	1	8	0	0
LDAR report <sup>k</sup>	125	2	250	0	0
Emissions averaging report <sup>l</sup>	20	1	20	0	0
<b>Subtotal for Reporting Requirements</b>					
4. Recordkeeping requirements					
A. Familiarization with the regulatory requirements	See 3A				
B. Plan activities	N/A				
C. Implement Activities	N/A				
D. Develop record system <sup>m</sup>	40	1	40	0	0
E. Develop startup, shutdown, malfunction plan <sup>n</sup>	100	1	100	0	0

F. Develop QA/QC Plan for CMS <sup>o</sup>	40	1	40	0	0
G. Time to enter information					
i. Records of startup, shutdown, and malfunction	1.5	1	1.5	0	0
ii. Records of CMS data					
a. Record continuously monitored parameters	1	365	365	0	0
b. Compile data	24	2	48	0	0
c. Information for semi-annual reports	16	2	32	0	0
d. LDAR recordkeeping	See 3C				
iii. Records of operating hours and bypass hours per semiannual compliance period	0.5	2	1	23	23
H. Calibration of CMS	376	1	376	0	0
I. Time to train personnel <sup>p</sup>	40	1	40	0	0
J. Refresher course <sup>q</sup>	16	1	16	0	0
K. Time for audits	N/A				0
L. Revise record systems due to SSM revisions <sup>r</sup>	8	1	8	0	0
M. Become familiar with CEDRI for electronic filing of notifications and reports <sup>s</sup>	8	1	8	0	0
<b>Subtotal for Recordkeeping Requirements</b>					
<b>Total Labor Burden and Costs (rounded) <sup>t</sup></b>					
<b>Total Capital and O&amp;M Cost (rounded) <sup>t</sup></b>					
<b>Grand Total (rounded) <sup>t</sup></b>					

#### Assumptions:

<sup>a</sup> There are 43 existing major source facilities subject to the NESHAP. We assume no new sources will become subject during the three-

<sup>b</sup> This ICR uses the following labor rates: \$147.40 per hour for Executive, Administrative, and Managerial labor; \$117.92 per hour for T labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, June 2018, "Table 2: Civilian Workers, by are from column 1, "Total Compensation." The rates have been increased by 110 percent to account for the benefit packages available to

<sup>c</sup> 23 facilities have add-on controls for compliance. The performance test will affect 12 facilities in the third year. These facilities do not a permits.

<sup>d</sup> Assumes 10 hours to conduct a CMS performance evaluation and 2 hours to prepare a notification.

<sup>e</sup> Assumes that all existing facilities have complied with the emissions averaging requirements; new facilities are not allowed to use emis:

<sup>f</sup> Assumes 50 percent of the new facilities will submit a pre-compliance report.

<sup>g</sup> Assumes that the 12 facilities without periodic testing requirements in their permits will do performance testing in year 3. Assume a 5% Assumes all other facilities will comply by submitting engineering calculations and design calculations.

<sup>h</sup> Assumes 10 percent of the facilities will implement process changes.

<sup>i</sup> Assumes 10 percent will have deviations.

<sup>j</sup> Assumes 5% of all facilities will report actions taken during a startup, shutdown, or malfunction is not consistent with the plan.

<sup>k</sup> Assumes all facilities will be subject to the equipment leak standards with an average of 125 hours per report.

<sup>l</sup> Assumes that 10 percent of existing facilities will use with the emissions averaging reports to comply.

<sup>m</sup> Assumes 40 hours to develop a record system for recording parameter monitoring information.

<sup>n</sup> Assumes 80 hours to draft the startup, shutdown, and malfunction plan and another 20 hours of review/revisions, for a total of 100 hour

<sup>o</sup> Assumes 40 hours to develop/review the QA/QC plan for the CMS. No QA/QC plan is required for the parameter monitoring systems i

<sup>p</sup> Assumes no facilities will use the alternative standard, which requires CEMS and QA/QC plans.

<sup>q</sup> Assumes 40 hours to train personnel and 16 hours for an annual refresher course.

<sup>r</sup> We assume that costs associated with elimination of the SSM exemption include time for re-evaluating previously developed

<sup>s</sup> Responses in year one associated with the use of electronic reporting include becoming familiar with CEDRI and the semi

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



0	0	\$0
0	0	\$0
0	0	\$0
0	0	\$0
0	0	\$0
1.15	2.3	\$3,013
0	0.0	\$0
0	0	\$0
0	0	\$0
0	0	\$0
0	0	\$0
0	0	\$0
0	0	\$0
<b>26</b>		<b>\$3,013</b>
<b>654</b>		<b>\$75,000</b>
		<b>\$247,000</b>
		<b>\$322,000</b>

year period of this ICR.

technical labor, and \$57.02 per hour for Clerical  
Occupational and Industry Group.” The rates  
those employed by private industry.

already have a testing requirement in their

sions averaging.

, failure and re-test rate (12 x 0.05 = 0.6).

s.

included in the rule.

ed SSM record systems in year one. Costs  
i-annual reporting form.

**Table 4 - Summary of Annual Respondent Burden and Cost - NESHAP for Miscellaneous Coating Manufacturing (40 CFR Part 63, Subpart HHHHH) (Amendments)**

Year	Technical Hours	Management Hours	Clerical Hours	Total Labor Hours	Labor Costs	Non-Labor (Capital/Startup and O&M) Costs
1	883	44	88	1,015	\$116,000	\$0
2	23	1	2	26	\$3,000	\$0
3	569	28	57	654	\$75,000	\$247,000
Total	1,475	74	148	1,696	\$194,000	\$247,000
Average	492	25	49.2	565	\$65,000	\$82,000

Year	Number of Respondents	Number of Responses	Reporting Hours	Recordkeeping Hours	Total Hours	Hours per Response
1	43	175	198	818	1,015	6.0
2	43	46	0	26	26	-
3	43	85	628	26	654	8
Total	-	306	826	871	1,696	-
Average	43	102	275	290	565	5.5

Average annual additional costs per respondent: \$3,420

Average annual additional hours per respondent: 

13.1
------

Average annual additional hours per response: 

5.5
-----

1g

Total Costs
\$116,000
\$3,000
\$322,000
\$441,000
\$147,000
Hours Per Respondent
24
1
15
39
13.1

**Table 5: Average Annual EPA Burden and Cost - NESHAP for Miscellaneous Coating Manufact Subpart HHHHH) (Amendments)**

**Year 1**

Activity	(A) EPA Hours per Occurrence	(B) Number of Occurrences per Year	(C) EPA Hours per Year (AxB)	(D) Plants per Year <sup>a</sup>	(E) Technical Hours per Year (CxD)
Notifications/Reports					
A. Review Notification of Construction/Reconstruction	2	1	2	0	0
B. Review Notification of Anticipated Startup	2	1	2	0	0
C. Review Notification of Actual Startup	2	1	2	0	0
D. Review Notification of Applicability of Standard	2	1	2	0	0
E. Review Notification of Performance Test	2	1	2	0	0
F. Review Performance Test Report <sup>c</sup>	8	1	8	0	0
G. Review Repeat Performance Test Report <sup>d</sup>	8	1	8	0	0
H. Review Notification of Initial CMS Performance Evaluation <sup>e</sup>	2	1	2	0	0
I. CMS Performance Evaluation <sup>e</sup>	4	1	4	0	0
J. Review Emissions Averaging Plan <sup>f</sup>	12	1	12	0	0
K. Review Pre-compliance Report <sup>g</sup>	2	1	2	0	0
L. Review Notification of Compliance Status <sup>h</sup>					
i. With performance test	4	1	4	0	0
ii. Without performance test	4	1	4	0	0
M. Review Notification of Process Change <sup>i</sup>	6	1	6	0	0
N. Review Semiannual Compliance Report <sup>j</sup>					
i. No deviations	2	1	2	0	0
ii. Deviations	4	1	4	0	0
O. Startup, shutdown, and malfunction report <sup>l</sup>	2	1	2	0	0
R. LDAR report <sup>m</sup>	2	1	2	0	0
S. Emissions averaging report <sup>f</sup>	4	1	4	0	0
T. Review record systems due to SSM revisions <sup>n</sup>	2	2	4	43	172
<b>TOTAL (rounded)<sup>n</sup></b>					

**Assumptions:**

<sup>a</sup> There are 43 existing major source facilities subject to the NESHAP. No new sources are expected to become subject over the three-year period.

<sup>b</sup> This cost is based on the following hourly labor rates times a 1.6 benefits multiplication factor to account for government overhead expenses: \$26.38 for Technical and \$26.38 for Clerical. These rates are from the Office of Personnel Management (OPM) "2018 General Schedule" which expires in 2019.

<sup>c</sup> Assumes that the 12 facilities without periodic testing requirements in their permits will do performance testing in year 3. All facilities' calculations based on: materials usage, materials HAP content, and control efficiency from testing (if applicable).

<sup>d</sup> Assume a 5% failure and re-test rate (12 x 0.05 = 0.6, rounded up to 1).

<sup>e</sup> Assumes no performance evaluations are required for the parameter monitoring systems included in the rule.

<sup>f</sup> Assumes that all existing facilities have already submitted emissions averaging plans.

<sup>g</sup> Assumes 50 percent of the new facilities will submit a pre-compliance report.

<sup>h</sup> Assumes all facilities will comply by submitting engineering calculations, design calculations, etc. with no performance tests.

<sup>i</sup> Assumes 10 percent of the facilities will implement process changes.

- <sup>j</sup> Assumes 10 percent will have deviations.
- <sup>l</sup> Assumes 5% of all facilities will report actions taken during a startup, shutdown, or malfunction is not consistent with the plan.
- <sup>m</sup> Assumes all facilities will be subject to the equipment leak standards.
- <sup>n</sup> These are costs associated with evaluating new SSM record systems in year one.
- <sup>o</sup> Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.





**Table 6: Average Annual EPA Burden and Cost - NESHAP for Miscellaneous Coating Manufact Subpart HHHHH) (Amendments)**

**Year 2**

Activity	(A) EPA Hours per Occurrence	(B) Number of Occurrences per Year	(C) EPA Hours per Year (AxB)	(D) Plants per Year <sup>a</sup>	(E) Technical Hours per Year (Cx D)
Notifications/Reports					
A. Review Notification of Construction/Reconstruction	2	1	2	0	0
B. Review Notification of Anticipated Startup	2	1	2	0	0
C. Review Notification of Actual Startup	2	1	2	0	0
D. Review Notification of Applicability of Standard	2	1	2	0	0
E. Review Notification of Performance Test	2	1	2	0	0
F. Review Performance Test Report <sup>c</sup>	8	1	8	0	0
G. Review Repeat Performance Test Report <sup>d</sup>	8	1	8	0	0
H. Review Notification of Initial CMS Performance Evaluation <sup>e</sup>	2	1	2	0	0
I. CMS Performance Evaluation <sup>e</sup>	4	1	4	0	0
J. Review Emissions Averaging Plan <sup>f</sup>	12	1	12	0	0
K. Review Pre-compliance Report <sup>g</sup>	2	1	2	0	0
L. Review Notification of Compliance Status <sup>h</sup>					
i. With performance test	4	1	4	0	0
ii. Without performance test	4	1	4	0	0
M. Review Notification of Process Change <sup>i</sup>	6	1	6	0	0
N. Review Semiannual Compliance Report <sup>j</sup>					
i. No deviations	2	1	2	0	0
ii. Deviations	4	1	4	0	0
O. Startup, shutdown, and malfunction report <sup>l</sup>	2	1	2	0	0
R. LDAR report <sup>m</sup>	2	1	2	0	0
S. Emissions averaging report <sup>f</sup>	4	1	4	0	0
T. Review record systems due to SSM revisions <sup>n</sup>	2	2	4	0	0
<b>TOTAL (rounded)<sup>n</sup></b>					

**Assumptions:**

<sup>a</sup> There are 43 existing major source facilities subject to the NESHAP. No new sources are expected to become subject over the three-year period.

<sup>b</sup> This cost is based on the following hourly labor rates times a 1.6 benefits multiplication factor to account for government overhead expenses: Technical and \$26.38 for Clerical. These rates are from the Office of Personnel Management (OPM) "2018 General Schedule" which expires in 2019.

<sup>c</sup> Assumes that the 12 facilities without periodic testing requirements in their permits will do performance testing in year 3. All facilities' calculations based on: materials usage, materials HAP content, and control efficiency from testing (if applicable).

<sup>d</sup> Assume a 5% failure and re-test rate (12 x 0.05 = 0.6, rounded up to 1).

<sup>e</sup> Assumes no performance evaluations are required for the parameter monitoring systems included in the rule.

<sup>f</sup> Assumes that all existing facilities have already submitted emissions averaging plans.

<sup>g</sup> Assumes 50 percent of the new facilities will submit a pre-compliance report.

<sup>h</sup> Assumes all facilities will comply by submitting engineering calculations, design calculations, etc. with no performance tests.

<sup>i</sup> Assumes 10 percent of the facilities will implement process changes.

- <sup>j</sup> Assumes 10 percent will have deviations.
- <sup>l</sup> Assumes 5% of all facilities will report actions taken during a startup, shutdown, or malfunction is not consistent with the plan.
- <sup>m</sup> Assumes all facilities will be subject to the equipment leak standards.
- <sup>n</sup> These are costs associated with evaluating new SSM record systems in year one.
- <sup>o</sup> Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.





**Table 7: Average Annual EPA Burden and Cost - NESHAP for Miscellaneous Coating Manufact Subpart HHHHH) (Amendments)**

**Year 3**

Activity	(A) EPA Hours per Occurrence	(B) Number of Occurrences per Year	(C) EPA Hours per Year (AxB)	(D) Plants per Year <sup>a</sup>	(E) Technical Hours per Year (Cx D)
Notifications/Reports					
A. Review Notification of Construction/Reconstruction	2	1	2	0	0
B. Review Notification of Anticipated Startup	2	1	2	0	0
C. Review Notification of Actual Startup	2	1	2	0	0
D. Review Notification of Applicability of Standard	2	1	2	0	0
E. Review Notification of Performance Test	2	1	2	13	26
F. Review Performance Test Report <sup>c</sup>	8	1	8	12	96
G. Review Repeat Performance Test Report <sup>d</sup>	8	1	8	1	8
H. Review Notification of Initial CMS Performance Evaluation <sup>e</sup>	2	1	2	0	0
I. CMS Performance Evaluation <sup>e</sup>	4	1	4	0	0
J. Review Emissions Averaging Plan <sup>f</sup>	12	1	12	0	0
K. Review Pre-compliance Report <sup>g</sup>	2	1	2	0	0
L. Review Notification of Compliance Status <sup>h</sup>					
i. With performance test	4	1	4	0	0
ii. Without performance test	4	1	4	0	0
M. Review Notification of Process Change <sup>i</sup>	6	1	6	0	0
N. Review Semiannual Compliance Report <sup>j</sup>					
i. No deviations	2	1	2	0	0
ii. Deviations	4	1	4	0	0
O. Startup, shutdown, and malfunction report <sup>l</sup>	2	1	2	0	0
R. LDAR report <sup>m</sup>	2	1	2	0	0
S. Emissions averaging report <sup>f</sup>	4	1	4	0	0
T. Review record systems due to SSM revisions <sup>n</sup>	2	2	4	0	0
<b>TOTAL (rounded)<sup>n</sup></b>					

**Assumptions:**

<sup>a</sup> There are 43 existing major source facilities subject to the NESHAP. No new sources are expected to become subject over the three-year period.

<sup>b</sup> This cost is based on the following hourly labor rates times a 1.6 benefits multiplication factor to account for government overhead expenses: Technical and \$26.38 for Clerical. These rates are from the Office of Personnel Management (OPM) "2018 General Schedule" which expires in 2019.

<sup>c</sup> Assumes that the 12 facilities without periodic testing requirements in their permits will do performance testing in year 3. All facilities' calculations based on: materials usage, materials HAP content, and control efficiency from testing (if applicable).

<sup>d</sup> Assume a 5% failure and re-test rate (12 x 0.05 = 0.6, rounded up to 1).

<sup>e</sup> Assumes no performance evaluations are required for the parameter monitoring systems included in the rule.

<sup>f</sup> Assumes that all existing facilities have already submitted emissions averaging plans.

<sup>g</sup> Assumes 50 percent of the new facilities will submit a pre-compliance report.

<sup>h</sup> Assumes all facilities will comply by submitting engineering calculations, design calculations, etc. with no performance tests.

<sup>i</sup> Assumes 10 percent of the facilities will implement process changes.

- <sup>j</sup> Assumes 10 percent will have deviations.
- <sup>l</sup> Assumes 5% of all facilities will report actions taken during a startup, shutdown, or malfunction is not consistent with the plan.
- <sup>m</sup> Assumes all facilities will be subject to the equipment leak standards.
- <sup>n</sup> These are costs associated with evaluating new SSM record systems in year one.
- <sup>o</sup> Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

uring (40 CFR Part 63,

(F) Managerial Hours per Year (Ex0.05)	(G) Clerical Hours per Year (Ex0.10)	(H) Total cost per year, \$ b
0	0	\$0
0	0	\$0
0	0	\$0
0	0	\$0
1.3	2.6	\$1,422
4.8	9.6	\$5,249
0.4	0.8	\$437
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
<b>150</b>		<b>\$7,100</b>

Labor Rates	
Manager	\$65.71
Technical	\$48.75
Clerical	\$26.38

er period of this ICR.  
 rates: \$65.71 for Managerial, \$48.75 for  
 includes locality rates of pay.

will comply by submitting engineering



**Table 8 - Summary of Annual Agency Burden and Cost - NESHAP for Miscellaneous (40 CFR Part 63, Subpart HHHHH) (Amendments)**

Year	Technical Hours	Management Hours	Clerical Hours	Total Hours	Labor Costs
1	172	9	17	198	\$9,400
2	0	0	0	0	\$0
3	130	7	13	150	\$7,100
Total	302	15.1	30.2	347	\$16,500
Average	100.7	5.0	10.1	116	\$5,500

Year	Number of Responses	Total Hours
1	86	198
2	0	0
3	26	150
Total	112	347
Average	37.3	116

Average annual hours per response:

3.1

**is Coating Manufacturing**

Non-Labor Costs	Total Costs
\$0	\$9,400
\$0	\$0
\$0	\$7,100
\$0	\$16,500
\$0	\$5,500

**Capital/Startup vs. Operation and Maintenance (O&M) Costs**

(A) Performance Testing	(B) Capital Startup Cost for One Performance Test	(C) Number of Respondents Doing Testing	(D) Total Capital/ Startup Cost (B x C)	(E) Annual O&M Costs for One Respondent	(F) Number of Respondents with O&M
Performance Testing	\$19,000	12 + 1	\$247,000	\$0	0
Totals (rounded)			\$247,000		

Note: In year 3, twelve sources test one control device each at a cost of \$19,000. One re-test is done at a cost of \$19,000. All figures have been rounded to three significant figures.

(G) Total O&M, (E x F)
\$0
\$0

Total

\$247,000

,000 each. Totals