

**SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY**

NESHAP for Plastic Parts and Products Surface Coating (40 CFR part 63, subpart PPPP)

1. Identification of the Information Collection

1(a) Title of the Information Collection

NESHAP for Plastic Parts and Products Surface Coating (40 CFR part 63, subpart PPPP).

1(b) Short Characterization/Abstract

The National Emission Standards for Hazardous Air Pollutants (NESHAP) for Plastic Parts and Products Surface Coating published at 40 CFR part 63, subpart PPPP were proposed on December 4, 2002, and promulgated on April 19, 2004. These regulations apply to existing facilities and new facilities that perform surface coating of plastic parts and products where the total Hazardous Air Pollutants (HAPs) emitted are greater than or equal to 10 tons per year of any one HAP, or where the total HAPs emitted are greater than or equal to 25 tons per year of any combination of HAPs, that use at least 100 gallons of HAP-containing coatings annually. New facilities include those that commenced construction or reconstruction after the date of the proposal. This information is being collected to ensure compliance with 40 CFR part 63, subpart PPPP.

In general, all NESHAP standards require initial notifications, performance tests, and periodic reports by the owners/operators of the affected facilities. They are also required to maintain records of the occurrence and duration of any startup, shutdown, or malfunction in the operation of an affected facility, or any period during which the monitoring system is inoperative. These notifications, reports, and records are essential in determining compliance, and are required of all affected facilities subject to NESHAP.

Any owner or operator subject to the provisions of this part shall maintain a file of these measurements, and retain the file for at least five years following the date of such measurements, maintenance reports, and records. All reports are sent to the delegated state or local authority. In the event that there is no such delegated authority, the reports are sent directly to the United States Environmental Protection Agency (EPA) regional office.

Based on our consultations with industry representatives, there is an average of one affected facility at each plant site and each plant site has only one respondent (i.e., the owner/operator of the plant site).

Approximately 827 sources are currently subject to the standard, and it is estimated that one additional source per year will become subject to the regulation in the next three years.

The form OMB 83-I for the previous ICR incorrectly indicated that the affected public

included federal government, and state, local, or tribal government facilities. The affected public includes only private business or other for-profit facilities. This has been corrected in this ICR.

The active (previous) ICR had the following Terms of Clearance (TOC): “Under the terms of the Government Paperwork Elimination Act, EPA should review this collection before resubmitting it for approval and ensure that, to the extent practicable, the collection has been revised to include electronic means of reporting.” EPA has addressed each item of concern in the TOC by reviewing the collection to determine whether it may be revised to include electronic means of reporting. Based upon EPA’s experience with similar collections, EPA estimates that electronic reporting would be approximately 10 percent of the collection. The Paperwork Reduction Act Submission Worksheet, Part II: Information Collection Detail, Item 10, has been revised to reflect this estimate.

2(a) Need/Authority for the Collection

The EPA is charged under section 112 of the Clean Air Act, as amended, to establish standards of performance for each category or subcategory of major sources and area sources of hazardous air pollutants. These standards are applicable to new or existing sources of hazardous air pollutants and shall require the maximum degree of emission reduction. In addition, section 114(a) states that the Administrator may require any owner or operator subject to any requirement of this Act to:

(A) Establish and maintain such records; (B) make such reports; (C) install, use, and maintain such monitoring equipment, and use such audit procedures, or methods; (D) sample such emissions (in accordance with such procedures or methods, at such locations, at such intervals, during such periods, and in such manner as the Administrator shall prescribe); (E) keep records on control equipment parameters, production variables or other indirect data when direct monitoring of emissions is impractical; (F) submit compliance certifications in accordance with Section 114(a)(3); and (G) provide such other information as the Administrator may reasonably require.

In the Administrator's judgment, hazardous air pollutant (HAP) emissions from plastic parts and products surface coating facilities cause or contribute to air pollution that may reasonably be anticipated to endanger public health or welfare. Therefore, NESHAP for this source category were promulgated at 40 CFR part 63, subpart PPPP.

2(b) Practical Utility/Users of the Data

The recordkeeping and reporting requirements in the standard ensure compliance with the applicable regulations that were promulgated in accordance with the Clean Air Act. The collected information is also used for targeting inspections and as evidence in legal proceedings.

Performance tests are required in order to determine an affected facility's initial capability to comply with the emission standards. Continuous emission monitors are used to ensure compliance with the standards at all times.

The notifications required in the standards are used to inform the Agency or delegated authority when a source becomes subject to the requirements of the regulations. The reviewing authority may then inspect the source to check if the pollution control devices are properly installed and operated, that leaks are being detected and repaired and that the standards are being met. The performance test may also be observed.

The required semiannual reports are used to determine periods of excess emissions, identify problems at the facility, verify operation/maintenance procedures and for compliance determinations.

3. Nonduplication, Consultations, and Other Collection Criteria

The recordkeeping and reporting requested is required under 40 CFR part 63, subpart PPPP.

3(a) Nonduplication

If the subject standards have not been delegated, the information is sent to the appropriate EPA regional office. Otherwise, the information is sent directly to the delegated state or local Agency. If a state or local agency has adopted their own similar standards to implement the Federal standards, a copy of the report submitted to the state or local agency can be sent to the Administrator in lieu of the report required by the Federal standards. Therefore, no duplication exists.

3(b) Public Notice Required Prior to ICR Submission to Office of Management and Budget (OMB)

An announcement of a public comment period for the renewal of this ICR was published in the Federal Register (71 FR 35652) on June 21, 2006. No comments were received on the burden published in the Federal Register.

3(c) Consultations

Any comments received since the last ICR renewal including those submitted in response to the first federal register notice announcing the renewal of this ICR have been reviewed. In this case, no comments were received. The Agency's industry experts have been consulted. The Agency's internal data sources and any projections of industry growth over the next three years have been considered.

EPA solicited additional comments from Susan Darbro and Brian Perkins of A-1 Fiberglass at 402-463-0180. These contacts provided no additional comments on the ICR.

The Agency's primary source of information as reported by industry is the AFS (Air Facility Subsystem) which is operated and maintained by EPA's Office of Compliance. AFS is EPA's database for the collection, maintenance, and retrieval of all compliance data. Approximately 827 respondents are currently subject to the regulation, and our consultations with Agency industry experts regarding the growth rate for the industry indicated that one additional respondent per year will become subject to the regulation over the next three years.

Estimates of growth rate, and burden were developed with extensive participation and consultation with plastic parts surface coating industry representatives during recent rulemaking for 40 CFR part 63, subpart PPPP. EPA believes that these estimates remain valid, and are the best information available. EPA has revised the number of facilities subject to the NESHAP, based upon an improved estimate from EPA's AFS database.

3(d) Effects of Less Frequent Collection

Less frequent information collection would decrease the margin of assurance that facilities are continuing to meet the required standards. Requirements for information gathering and recordkeeping are useful techniques to ensure that good operation and maintenance practices are applied and emission limitations are met. If the information required by these standards was collected less frequently, the likelihood of detecting poor operation and maintenance of control equipment and noncompliance would decrease.

3(e) General Guidelines

These reporting or recordkeeping requirements do not violate any of the regulations established by OMB at 5 CFR part 1320, section 1320.5.

These standards require affected facilities to maintain all records, including reports and notifications for at least five years. This is consistent with the General Provisions as applied to the standards. EPA believes that the five-year records retention requirement is consistent with the part 70 permit program and the five-year statute of limitations on which the permit program is based. In addition, the retention of records for five years would allow EPA to establish the compliance history of a source and any pattern of compliance for purposes of determining the appropriate level of enforcement action. Historically, EPA has found that the most flagrant violators frequently have violations extending beyond the five years. EPA would be prevented from pursuing the worst violators due to the destruction or nonexistence of records if records were retained for less than five years.

3(f) Confidentiality

Any information submitted to the Agency for which a claim of confidentiality is made will be safeguarded according to the Agency policies set forth in title 40, chapter 1, part 2, subpart B - Confidentiality of Business Information (see 40 CFR 2; 41 FR 36902, September 1, 1976; amended by 43 FR 40000, September 8, 1978; 43 FR 42251, September 20, 1978; 44 FR 17674, March 23, 1979).

3(g) Sensitive Questions

The reporting or recordkeeping requirements do not contain sensitive questions.

4. The Respondents and the Information Requested

4(a) Respondents/SIC Codes

The respondents of the recordkeeping and reporting requirements are plastic parts and products surface coating facilities. The United States Standard Industrial Classification (SIC) codes for the respondents affected by the standards, which correspond to the North American Industry Classification System (NAICS) codes, are listed below for source category descriptions.

Standard	SIC Codes	NAICS Codes
40 CFR part 63, subpart PPPP	2522	337214
	3086	32614, 32615
	3089, 3999	326199
	3578, 3579	333313
	3663, 3679	33422
	3429, 3519, 3599, 3714, 3799	336399
	3799	336999
	2599, 3821, 3841	339111, 339112
	3949, 3069	33992
	3993	33995
	2499, 3634, 3999	339999

4(b) Information Requested

(i) Data Items

All data in this ICR that is recorded and/or reported is required by 40 CFR part 63, subpart PPPP.

A source must make the following reports:

Notifications	
Initial notification	63.4510(b), 63.5(d), 63.9(b)
Notification of compliance status	63.4510(c), 63.9(h)
Notification of construction or reconstruction	63.4510(a), 63.5
Notification of actual startup	63.4510(a), 63.9(b)
Notification of performance test	63.4510(a), 63.7(b), 63.8(e), 63.9(e)

Notification Reports	
Semiannual report	63.4520(a)
Excess emissions report	63.4520(a)(4-7)
Report of performance test	63.4720(b)
Startup, shutdown, malfunction report	63.4720(c)

A source must keep the following records:

Recordkeeping	
Five year retention of records	63.4531(b), 63.10(b)
Material formulation data	63.4530(b)
Records of HAP content calculations	63.4530(c)
Copies of notifications and reports	63.4530(a)
Records of names of materials used	63.4530(d)
HAP fractions in each material used	63.4530(e)
Coating solids fraction in each material used	63.4530(f)
Density of materials used	63.4530(b)

Recordkeeping	
Documentation of waste material shipped offsite	63.4530(g)
Documentation of deviations	63.4530(h)
Start-up, shutdown, and malfunction plan/records	63.4530(i), 63.6(e)
Records of continuous compliance with operating limits	63.4530(i)
Documentation of capture system efficiency determination	63.4530(i)
Documentation of add-on control device destruction or removal efficiency determination	63.4530(i)
Documentation of control device performance tests	63.4530(i), 63.10(b)
Determination of capture system and add-on control operating limits	63.4530(i)
Work practice plan/records	63.4530(i)

Electronic Reporting

Currently, sources are using monitoring equipment that provides parameter data in an automated way, e.g., inlet and outlet concentrations when determining percent efficiency. Although personnel at the source still need to evaluate the data, this type of monitoring equipment has significantly reduced the burden associated with monitoring and recordkeeping. In addition, some regulatory agencies are setting up electronic reporting systems to allow sources to report electronically which is reducing the reporting burden. However, electronic reporting systems are still not widely used by the regulatory agencies. It is estimated that approximately 10 percent of the respondents use electronic reporting.

(ii) Respondent Activities

Respondent Activities
Read instructions.
Install, calibrate, maintain, and operate CMS for temperature, for gas flow, or for pressure drop for oxidizer, carbon adsorber, condenser, concentrator, or capture system.
Perform initial performance test, Reference Method 1, 1A, 2, 2A, 2C, 2D, 2F, 2G, 3, #A, 3B, 4, 24, 25, 25A, 204, 204A, 204B, 204C, 204D, 204E, 204F, 311, or ASTM Method D1475-98, D2697-86, D6093-97 test, and repeat performance tests if necessary.
Write the notifications and reports listed above.
Enter required recordkeeping information detailed above.

Respondent Activities
Submit the required reports developing, acquiring, installing, and utilizing technology and systems for the purpose of collecting, validating, and verifying information.
Develop, acquire, install, and utilize technology and systems for the purpose of processing and maintaining information.
Develop, acquire, install, and utilize technology and systems for the purpose of disclosing and providing information.
Train personnel to be able to respond to a collection of information.
Transmit, or otherwise disclose the information.

5. The Information Collected -- Agency Activities, Collection Methodology, and Information Management

5(a) Agency Activities

EPA conducts the following activities in connection with the acquisition, analysis, storage, and distribution of the required information.

Agency Activities
Observe initial performance tests and repeat performance tests if necessary.
Review notifications and reports, including performance test reports, excess emissions reports, startup, shutdown, malfunction plan, and quality control plan for CMS required to be submitted by industry.
Audit facility records.
Input, analyze, and maintain data in the Air Facility System (AFS).

5(b) Collection Methodology and Management

Following notification of startup, the reviewing authority might inspect the source to determine whether the pollution control devices are properly installed and operated. Performance test reports are used by the Agency to discern a source's initial capability to comply with the emission standard. Data and records maintained by the respondents are tabulated and published for use in compliance and enforcement programs. The semiannual reports are used for problem identification, as a check on source operation and maintenance, and for compliance determinations.

Information contained in the reports is entered into the AFS which is operated and maintained by EPA's Office of Compliance. AFS is EPA's database for the collection, maintenance, and retrieval of compliance data for approximately 125,000 industrial and government-owned facilities. EPA uses the AFS for tracking air pollution compliance and enforcement by local and state regulatory agencies, EPA regional offices and EPA headquarters.

EPA and its delegated Authorities can edit, store, retrieve and analyze the data.

The records required by this regulation must be retained by the owner or operator for five years.

5(c) Small Entity Flexibility

A majority of the respondents are large entities (i.e., large businesses). However, the impact on small entities (i.e., small businesses) was taken into consideration during the development of the regulation. Due to technical considerations involving the process operations and the types of control equipment employed, the recordkeeping and reporting requirements are the same for both small and large entities. The Agency considers these requirements the minimum needed to ensure compliance and, therefore, cannot reduce them further for small entities. To the extent that larger businesses can use economies of scale to reduce their burden, the overall burden will be reduced.

5(d) Collection Schedule

The specific frequency for each information collection activity within this request is shown in Table 1: Annual Respondent Burden and Cost, NESHAP for Plastic Parts and Products Surface Coating (40 CFR Part 63, Subpart PPPP).

6. Estimating the Burden and Cost of the Collection

Table 1 documents the computation of individual burdens for the recordkeeping and reporting requirements applicable to the industry for the subpart included in this ICR. The individual burdens are expressed under standardized headings believed to be consistent with the concept of burden under the Paperwork Reduction Act. Where appropriate, specific tasks and major assumptions have been identified. Responses to this information collection are mandatory.

The Agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB Control Number.

6(a) Estimating Respondent Burden

The average annual burden to industry over the next three years from these recordkeeping and reporting requirements is estimated to be 320,917 (Total Labor Hours from Table 1). These hours are based on Agency studies and background documents from the development of the regulation, Agency knowledge and experience with the NESHAP program, the previously approved ICR, and any comments received.

6(b) Estimating Respondent Costs

(i) Estimating Labor Costs

This ICR uses the following labor rates:

Managerial	\$100.99 (\$48.09 + 110%)
Technical	\$87.97 (\$41.89 + 110%)
Clerical	\$43.81 (\$20.86 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, December 2005, ATable 2. Civilian Workers, by occupational and industry group.Ⓒ The rates are from column 1, ATotal compensation.Ⓒ The rates have been increased by 110% to account for the benefit packages available to those employed by private industry.

(ii) Estimating Capital and Operations and Maintenance Costs

This section covers the costs associated with all types of continuous monitoring equipment [e.g., continuous emissions monitoring systems (CEMS) and continuous parameter monitors]. The type of industry costs associated with the information collection activity in the subject standards are both labor costs which are addressed elsewhere in this ICR and the costs associated with continuous monitoring. The capital/startup costs are one-time costs when a facility becomes subject to the regulation. The annual operation and maintenance costs are the ongoing costs to maintain the monitors and other costs such as photocopying and postage.

(iii) Capital/Startup vs. Operating and Maintenance (O&M) Costs

Capital/Startup vs. Operation and Maintenance (O&M) Costs						
(A) Continuous Monitoring Device	(B) Capital/ Startup Cost for One Respondent	(C) Number of New Respondents	(D) Total Capital/Startu p Cost (B X C)	(E) Annual O&M Costs for One Respondent	(F) Number of Respondents with O&M	(G) Total O&M, (E X F)
CEM	\$16,000	1	\$16,000	\$1,200	207 ¹	\$248,400

¹ Estimated 25 percent of existing facilities use add-on controls.

The total Capital/Start-up costs for this ICR are \$16,000.

The total Operating and Maintenance (O&M) Costs for this ICR are \$248,400.

The average annual cost for capital/startup and operation and maintenance costs to industry over the next three years of the ICR is estimated to be \$264,400. The continuous monitoring costs that are included in this section consist only of those capital/start-up and O&M costs that a source incurs as a result of the standard. Some continuous monitoring costs may not be included in this section. For instance, if a particular industry typically utilizes a control device that must have a continuous monitor (e.g., temperature, pressure drop, etc.) to function properly, and the recordation of additional measurements beyond the minimum are required by the standard, then there is no capital/startup or O&M cost, but there is a labor cost to record the additional readings. Such a cost would not appear in this section, but in the industry burden

Section 6(d) below.

6(c) Estimating Agency Burden and Cost

The only costs to the Agency are those costs associated with analysis of the reported information. EPA's overall compliance and enforcement program includes activities such as the examination of records maintained by the respondents, periodic inspection of sources of emissions, and the publication and distribution of collected information.

The average annual Agency cost during the three years of the ICR is estimated to be \$3,824,062 [see Table 2 in Section 6(e)].

This cost is based on the average hourly labor rate as follows:

Managerial	\$57.20	(GS-13, Step 5, \$35.75 x 1.6)
Technical	\$42.45	(GS-12, Step 1, \$26.53 x 1.6)
Clerical	\$22.96	(GS-6, Step 3, \$14.35 x 1.6)

These rates are from the Office of Personnel Management (OPM) A2006 General Schedule@ which excludes locality rates of pay. Details upon which this estimate is based appear in Table 2: NESHAP for Plastic Parts and Products Surface Coating (40 CFR Part 63, Subpart PPPP).

6(d) Estimating the Respondent Universe and Total Burden and Costs

Based on our research for this ICR, there are approximately 827 existing sources currently subject to the standard. It is estimated that one additional source will become subject to the regulation in each of the next three years.

Number of respondents is calculated using the following table which addresses the three years covered by this ICR.

Number of Respondents					
	Respondents That Submit Reports		Respondents That Do Not Submit Any Reports		
Year	(A) Number of New Respondents ¹	(B) Number of Existing Respondents	(C) Number of Existing Respondents That Keep Records but Do Not Submit Reports	(D) Number of Existing Respondents That Are Also New Respondents	(E) Number of Respondents (E=A+B+C-D)
1	1	827	0	0	828
2	1	828	0	0	829
3	1	829	0	0	830
Average	1	828	0	0	829

¹ New respondents include sources with constructed, reconstructed and modified affected facilities.

To avoid double-counting respondents, column D is subtracted. As shown above, the average Number of Respondents over the three-year period of this ICR is 829.

The total number of annual responses per year is calculated using the following table:

Total Annual Responses				
(A) Information Collection Activity	(B) Number of Respondents	(C) Number of Responses	(D) Number of Existing Respondents That Keep Records But Do Not Submit Reports	(E) Total Annual Responses $E=(B \times C)+D$
Initial notification	1	1	0	1
Notification of compliance status	1	1	0	1
Notification of construction/reconstruction	1	1	0	1
Notification of actual startup	1	1	0	1
Notification of performance test	1	1.2	0	1
Report of performance test	1	1.2	0	1
Semiannual report	828	2	0	1,656
Excess emissions report	828	2	0	1,656
Startup, shutdown, malfunction report	828	1	0	828
			Total	4,146

The number of Total Annual Responses is 4,146.

Note that the total annual capital and O&M costs to the regulated entity are \$264,400.

6(e) Bottom Line Burden Hours and Cost Tables

The bottom line burden hours and cost tables for both the Agency and the respondents appear below. The annual public reporting and recordkeeping burden for this collection of information is estimated to average 77 hours per response.

The detailed bottom line burden hours and cost calculations for the respondents and the Agency are shown in Tables 1 and 2, respectively, and summarized below.

(i) Respondent Tally

The total annual labor costs are \$27,180,428. Details regarding these estimates may be found in Table 1: Annual Respondent Burden and Cost: NESHAP for Plastic Parts and Products Surface Coating (40 CFR Part 63, Subpart PPPP). Furthermore, the annual public reporting and recordkeeping burden for this collection of information is estimated to average 77

hours per response.

The total annual capital and O&M costs to the regulated entity are \$264,400.

(ii) The Agency Tally

The average annual Agency burden and cost over next three years is estimated to be 60,615 labor hours at a cost of \$3,824,062. See Table 2: NESHAP for Plastic Parts and Products Surface Coating (40 CFR Part 63, Subpart PPPP).

6(f) Reasons for Change in Burden

The increase in burden from the most recently approved ICR is due to an adjustment. The adjustment increase in burden is due to routine actions taken by the facilities to comply with 40 CFR part 63, subpart PPPP. The previous ICR included only the burden incurred by facilities initiating activities related to compliance in advance of the compliance date. The increase in burden reflects the need for facilities to fully comply with the rule requirements.

The adjustment increase in burden is also due to a revision in the number of facilities subject to the NESHAP, based upon an improved estimate from EPA's AFS database.

The increase in O&M costs is due to maintenance of equipment used to verify compliance with the rule requirements.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 77 hours per response. Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to a collection of information; search data sources; complete and review the collection of information; and transmit or otherwise disclose the information.

An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a valid OMB Control Number. The OMB Control Numbers for EPA's regulations are listed at 40 CFR part 9 and 48 CFR chapter 15.

To comment on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques, EPA has established a public docket for this ICR under Docket ID Number EPA-HQ-OECA-2006-0433. An electronic version of the public docket is available at <http://www.regulations.gov/> which may be used to obtain a copy of the draft

collection of information, submit or view public comments, access the index listing of the contents of the docket, and to access those documents in the public docket that are available electronically. When in the system, select “search,” then key in the docket ID number identified in this document. The documents are also available for public viewing at the Enforcement and Compliance Docket and Information Center in the EPA Docket Center (EPA/DC), EPA West, Room B102, 1301 Constitution Ave., NW, Washington, DC. The EPA Docket Center Public Reading Room is open from 8:30 a.m. to 4:30 p.m., Monday through Friday, excluding legal holidays. The telephone number for the Reading Room is (202) 566-1744, and the telephone number for the docket center is (202) 566-1752. Also, you can send comments to the Office of Information and Regulatory Affairs, Office of Management and Budget, 725 17th Street, NW, Washington, DC 20503, Attention: Desk Officer for EPA. Please include the EPA Docket ID Number EPA-HQ-OECA-2006-0433 and OMB Control Number 2060-0537 in any correspondence.

Part B of the Supporting Statement

This part is not applicable because no statistical methods were used in collecting this information.