

**SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY**

NSPS for Polymeric Coating of Supporting Substrates Facilities

1. Identification of the Information Collection

1(a) Title of the Information Collection

NSPS for Polymeric Coating of Supporting Substrates Facilities (40 CFR part 60, subpart VVV) (Renewal)

1(b) Short Characterization/Abstract

The New Source Performance Standards (NSPS) for the regulations at 40 CFR part 60, subpart VVV were proposed on April 30, 1987 and promulgated on September 11, 1989. These regulations apply to each coating operation and any on-site coating mix preparation equipment used to prepare coatings for the polymeric coating of supporting substrates at existing facilities and new facilities. New facilities include those that commenced construction, modification or reconstruction after the date of proposal. This information is being collected to assure compliance with 40 CFR part 60 subpart VVV.

In general, all New Source Performance Standards (NSPS) require initial notifications, performance tests, and periodic reports. Owners or operators 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 sources subject to NSPS.

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 two 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.

Approximately 53 respondents are currently subject to the regulation, and it is estimated that one additional respondent will become subject to the regulation in each of the next three years.

OMB approved the currently active ICR without any "Terms of Clearance."

The term, "Affected Public", applies to private sector businesses or other for-profits that perform polymeric coating of supporting substrates. The burden to the "Affected Public" may be found in Table 1: Annual Respondent Burden and Cost, NSPS for Polymeric Coating of Supporting Substrates Facilities (attached). The burden to the "Federal Government" is attributed entirely to work performed by federal employees or government contractors, and may

be found in Table 2: Annual Agency Burden and Cost, NSPS for Polymeric Coating of Supporting Substrates Facilities (attached).

2. Need for and Use of the Collection

2(a) Need/Authority for the Collection

The EPA is charged under section 111 of the Clean Air Act (CAA), as amended, to establish standards of performance for new stationary sources that reflect:

...application of the best technological system of continuous emissions reduction which (taking into consideration the cost of achieving such emissions reduction, or any non-air quality health and environmental impact and energy requirements) the Administrator determines has been adequately demonstrated Section 111(a)(1).

The Agency refers to this charge as selecting the best demonstrated technology (BDT). Section 111 also requires that the Administrator review and, if appropriate, revise such standards every four years.

In addition, section 114(a) states that the Administrator may require any owner/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, volatile organic compounds (VOC) emissions from polymeric coating of supporting substrates facilities cause or contribute to air pollution that may reasonably be anticipated to endanger public health or welfare. Therefore, NSPS were promulgated for this source category at 40 CFR part 60, subpart VVV.

2(b) Practical Utility/Users of the Data

The control of emissions of VOCs from polymeric coating of supporting substrates facilities requires not only the installation of properly designed equipment, but also the operation and maintenance of that equipment. Emissions of VOCs from polymeric coating of supporting

substrates facilities are generated by each coating operation and the associated onsite coating mix preparation equipment used to prepare coatings for the polymeric coating of supporting substrates. These standards rely on: the capture of VOC emissions by a partial or total enclosure around the coating operation (“alternative standard”), and/or by covers on each piece of affected mix preparation equipment; the reduction of VOC emissions to the atmosphere from the coating operation to a control device (“emission reduction standard”), and/or from the affected covered equipment to a control device; and the recovery of VOC emissions at one coating operation if the liquid material balance is used to demonstrate compliance.

The required notifications are used to inform the Agency or delegated authority when a source becomes subject to the standard.

The recordkeeping and reporting requirements in the standard ensure compliance with the applicable regulations which 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 standard(s). 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 and the standards are being met. Operating conditions that may be noted include: a measure of the gaseous volumetric flow rates; VOC emissions from the coating operation; capture efficiency of the control device; amount of coating applied at the coating applicator after all ingredients have been added to the coating; VOC content of all coatings; a measure of the cumulative amount of VOC recovered by the control device over a nominal 1-month period; the average inward face velocity across all natural draft openings of a total enclosure; and other parameters that demonstrate a total enclosure has been properly installed. The performance test may also be observed.

The required quarterly/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 60, subpart VVV.

3(a) Nonduplication

If the subject standards have not been delegated, the information is sent directly 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 its 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 OMB

An announcement of a public comment period for the renewal of this ICR was published in the Federal Register (72 FR 10735) on March 9, 2007. No comments were received on the burden published in the Federal Register.

3(c) Consultations

In order to obtain information on the burden for this ICR, EPA consulted Jeff Rose of Cytec Engineered Materials, 501 West 3rd Street, Winona, Minnesota 55987 (507-312-8824). EPA also consulted its AIRS Facility Subsystem (AFS) to identify sources subject to the standard.

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

None of these reporting or recordkeeping requirements violate any of the regulations established by OMB in 5 CFR 1320.5.

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 (CBI) (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

None of the reporting or recordkeeping requirements contain sensitive questions.

4. The Respondents and the Information Requested

4(a) Respondents/SIC Codes

The respondents of the recordkeeping and reporting requirements are polymeric coating of supporting substrates facilities including:

Regulation: 40 CFR, Part 60, Subpart VVV	
SIC Codes	NAICS Codes
2241	313221
2295	31332
2296	314992
2394	314912
3052	32622
3053	339991
3069	31332
	315299
	315999
	339113
	33992
	339932
	326192
326299	

4(b) Information Requested

(i) Data Items

All data in this ICR that is recorded and/or reported is required by 40 CFR part 60, subpart VVV.

A source must make the following reports:

Notification Reports	
Requirement	Regulation reference
Construction/reconstruction.	60.7(a)(1)
Actual startup.	60.7(a)(3)
Initial performance test results.	60.8 (a)
Initial performance test.	60.8(d)
Demonstration of continuous monitoring system.	60.7(a)(5)
Physical or operational change.	60.7(a)(4)

Notification Reports	
Requirement	Regulation reference
Projected and actual VOC use, if VOC use is less than 95.0 Mg/yr or less than 130 Mg/yr.	60.747
Excess emissions or periods of noncompliance quarterly.	60.747(d)(1)-(6) and 60.747(e)(2)
No excess emissions/no deviations from operating parameters semiannually.	60.747(d)(7) and 60.747(e)(1)

A source must maintain the following records:

Recordkeeping	
Record startups, shutdowns, malfunctions, periods where the continuous monitoring system is inoperative.	60.7(b)
Records for performance test measurements.	60.8(a)
Record projected VOC use and actual 12-month VOC use, operating parameters (e.g., concentration level of organic compounds, periods of actual coating operations, system efficiency, average combustion temperature, gas temperature before and after the catalytic bed) of the control device (e.g., carbon absorption system, thermal incinerator, and catalytic incinerator) and other parameters depending on the compliance method being used.	60.747
Records for sources with continuous monitoring systems.	60.7(f)
Records are required to be retained for two years. The first two years of records must be kept onsite.	60.747(h)

Electronic Reporting

At the present, respondents are using monitoring equipment that automatically records parameter data, e.g., temperature, pressure drop, leaks and spills of mercury, etc. Although personnel at the affected facility must evaluate the data, this internal automation has significantly reduced the burden associated with monitoring and recordkeeping at the plant site.

Also, regulatory agencies in cooperation with the respondents, continue to create reporting systems to transmit data electronically. However, electronic reporting systems are still not widely used. At this time, 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 required monitoring devices to monitor the concentration level of organic compounds, the combustion temperature, gas temperature or other value of the chosen parameter, depending on the control device used.
Monitor projected and actual VOC use.
Perform performance tests and use the appropriate reference methods: Reference Method 24 test to determine VOC content in coating or formulation data (if approved by Administrator); Reference Method 25 (or alternative methods 18, or 25A) to determine incinerator VOC gas streams concentration, the efficiency of a fixed-bed carbon adsorption system; Method 1 or 1A for sample and velocity traverses; Method 2, 2A, 2C or 2D for velocity and volumetric rates; Method 3 for gas analysis; and Method 4 for stack gas moisture measurements.
Write the notifications and reports listed above.
Enter information required to be recorded above.
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.
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.
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, and excess emissions reports, required to be submitted by industry.
Audit facility records.
Input, analyze, and maintain data in the AIRS Facility Subsystem (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, and note the operating conditions under which compliance was achieved. Data and records maintained by the respondents are tabulated and published for use in compliance and enforcement programs. The quarterly reports of noncompliance and semiannual reports of compliance 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 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 and annual emission inventory data for more than 125,000 industrial and government-owned facilities. EPA uses AFS for tracking air pollution compliance and enforcement by local and state regulatory agencies, and 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 two years.

5(c) Small Entity Flexibility

There is a distribution of business sizes affected by this regulation. However, the impact on small entities (i.e., small businesses) was taken into consideration during the development of the regulation. Any affected facility for which the amount of VOC used is less than 95 Mg per 12-month period is subject only to the requirements of 40 CFR, Sections 60.744(b), 60.747(b) and 60.747(c) which require reports and records of VOC use. This reduces regulatory requirements for smaller facilities. 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, NSPS for Polymeric Coating of Supporting Substrates Facilities (40 CFR part 60, subpart VVV).

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 each of the subparts 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 (40 CFR part 60, section 60.747).

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 12,623 (Total Labor Hours from Table 1). These hours are based on Agency studies and background documents from the development of the standards or test methods, Agency knowledge and experience with the NSPS 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	\$95.32	(\$45.39 + 110%)
Technical	\$64.60	(\$30.76 + 110%)
Clerical	\$40.09	(\$19.09 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, December 2003, "Table 2. Private industry, by occupational and industry group." The rates are from column 1, "Total compensation." The rates have been increased by 110 percent to account for the benefit packages available to those employed by private industry.

(ii) Estimating Capital and Operation and Maintenance Costs

The type of industry costs associated with the information collection activities 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 monitor(s) and other costs such as photocopying and postage.

(iii) Capital/Startup vs. Operation 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/Startup 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)
VOC monitor	40,000	1	40,000	8,500	53	450,500
Temperature monitor	8,500	1	8,500	2,000	53	106,000

The total capital/startup costs for this ICR are \$48,500. This is the total of column D in the above table.

The total operating and maintenance (O&M) costs for this ICR are \$556,500. This is the total of column G.

The total respondent costs in block 14 have been calculated as the addition of the capital/startup costs, and the annual operation and maintenance costs. The average annual cost for capital/startup and operation and maintenance costs to industry over the next three years of the ICR are estimated to be \$605,000. The continuous monitoring costs that are included in this section consist only of those capital/startup 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 \$30,478, see Table 2. Annual Agency Burden and Cost, NSPS for Polymeric Coating of Supporting Substrates Facilities (40 CFR part 60, subpart VVV).

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

Managerial	\$54.66	(GS-13, Step 5, \$34.16 x 1.6)
Technical	\$40.56	(GS-12, Step 1, \$25.35 x 1.6)
Clerical	\$21.95	(GS-6, Step 3, \$13.72 x 1.6)

These rates are from the Office of Personnel Management (OPM) “2004 General Schedule” which excludes locality rates of pay. Details upon which this estimate is based appear in Table 2. Annual Agency Burden and Cost, NSPS for Polymeric Coating of Supporting Substrates Facilities (40 CFR part 60, subpart VVV).

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

Based on our research for this ICR, approximately 53 existing sources are currently subject to the standard. It is estimated that an additional one source will become subject to the standard in 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	5	51	0	4	52
2	5	52	0	4	53
3	5	53	0	4	54
Average	5	52	0	4	53

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 53.

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=(BxC)+D
Notification of construction/reconstruction	5	1	0	5
Notification of actual startup	5	1	0	5

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=(BxC)+D
Notification of initial performance test	5	1	0	5
Notification of VOC use at the end of the initial year	1	1	0	1
Report of performance test	5	1	0	5
Report of performance retest	1	1	0	1
Report of monitoring exceedances and periods of noncompliance	11	4	0	44
Report of no excess emissions	42	2	0	84
Report when 1 st projected VOC use exceeds the applicable cutoff	2	1	0	2
Notification of changes	1	1	0	1
			Total	153

The number of Total Annual Responses is 153. Note that four respondents have been double counted in the above table because they have both existing affected facilities and new affected facilities.

The total annual labor costs are \$805,367. Details regarding these estimates may be found in Table 1. Annual Respondent Burden and Cost, NSPS for Polymeric Coating of Supporting Substrates Facilities (40 CFR part 60, subpart VVV), attached.

The total annual capital/startup and O&M costs to the regulated entities are \$605,000. The cost calculations are detailed in Section 6(b)(iii), Capital/Startup vs. Operation and Maintenance (O&M) Costs.

The average annual Agency burden and cost over next three years is estimated to be 771 labor hours at a cost of \$30,478. See Table 2. Annual Agency Burden and Cost, NSPS for Polymeric Coating of Supporting Substrates Facilities (40 CFR part 60, subpart VVV), attached.

6(e) Bottom Line Burden Hours Burden Hours and Cost Tables

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 \$805,367. Details regarding these estimates may be found in Table 1. Annual Respondent Burden and Cost, NSPS for Polymeric Coating of Supporting Substrates Facilities (40 CFR part 60, subpart VVV), attached. Furthermore, the annual public reporting and recordkeeping burden for this collection of information is estimated to average 83 hours per response.

The total annual capital/startup and O&M costs to the regulated entity are \$605,000. The cost calculations are detailed in Section 6(b)(iii), Capital/Startup vs. Operation and Maintenance (O&M) Costs.

(ii) The Agency Tally

The average annual Agency burden and cost over next three years is estimated to be 771 labor hours at a cost of \$30,478. See Table 2. Annual Agency Burden and Cost, NSPS for Polymeric Coating of Supporting Substrates Facilities (40 CFR part 60, subpart VVV), attached.

6(f) Reasons for Change in Burden

There are no changes in the labor hours or costs in this ICR compared to the previous ICR (see rounding-off adjustment below). This is due to two considerations. First, the regulations have not changed over the past three years and are not anticipated to change over the next three years. Secondly, the growth rate for the industry is very low, negative or non-existent, so there is no significant change in the overall burden.

Since there are no changes in the regulatory requirements and there is no significant industry growth, the labor hours and cost figures in the previous ICR are used in this ICR and there is no change in burden to industry.

The labor hour and cost burden in this ICR are the same as in the previous ICR, however, there is an adjustment. The Annual Cost Burden as shown in Part II, Block 12 of the ICRAS (Information Collection Request, Review and Approval System) form is reduced (-\$1,000) to account for rounding up/down in the previous ICR.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 83 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-2007-0033. 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 3334, 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-2007-0033 and OMB Control Number 2060-0181 in any correspondence.

Part B of the Supporting Statement

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

TABLE 1. Annual Respondent Burden and Cost: NSPS for Polymeric Coating of Supporting Substrates Facilities (40 CFR part 60, Subpart VVV)

Burden item	(A) Person-hours per occurrence	(B) Number of occurrences per year	(C) Technical person-hours per respondent per year (C=A*B)	(D) ^b Respondents per year	(E) Technical person-hours per year (E=C*D)	(F) Management person-hours per year (F=E*0.05)	(G) Clerical person-hours per year (G=E*0.1)	(H) Respondent person-hours per year (H=E+F+G)	(I) Cost, \$ ^a
1. Applications	N/A								
2. Surveys and Studies	N/A								
3. Reporting Requirements									
A. Read instructions	1	1	1	5 ^{b+c+d}	5	0.3	0.5	6	\$367
B. Required activities									
• Initial performance test	280	1	280	5	1,400	70	140	1,610	\$102,725
• Repeat of performance test	280	1	280	1 ^e	280	14	28	322	\$20,545
• Monthly compliance test	90	12	1080	1 ^f	1,080	54	108	1,242	\$79,245
C. Create information	included in 3B								
D. Gather existing information	included in 3E								
E. Write report									
New Affected Facilities									
• Notification of construction/ reconstruction	2	1	2	5	10	0.5	1	12	\$734
• Notification of actual startup	2	1	2	5	10	0.5	1	12	\$734
• Notification of initial performance test	2	1	2	5	10	0.5	1	12	\$734
• Notification of VOC use at the end of the initial year	2	1	2	1 ^g	2	0.1	0.2	2	\$147
• Report of performance test	included in 3B								
New and Existing Affected Facilities									
• Report of monitoring exceedances and periods of non-compliance	16	4	64	11 ^h	704	35	70	810	\$51,656
• Report of no excess emissions	8	2	16	42 ⁱ	672	34	67	773	\$49,308
• Report when 1 st projected VOC use exceeds the applicable cutoff	2	1	2	2	4	0.2	0.4	5	\$294
• Report when 1 st actual 12-month VOC use exceeds the applicable cutoff	2	1	2	0 ^j	0	0	0	0	\$0

Burden item	(A) Person-hours per occurrence	(B) Number of occurrences per year	(C) Technical person-hours per respondent per year (C=A*B)	(D) ^b Respondents per year	(E) Technical person-hours per year (E=C*D)	(F) Management person-hours per year (F=E*0.05)	(G) Clerical person-hours per year (G=E*0.1)	(H) Respondent person-hours per year (H=E+F+G)	(I) Cost, \$ ^a
• Notification of changes	4	1	4	5 ^d	20	1	2	23	\$1,468
4. Recordkeeping Requirements									
New and Existing Affected Facilities									
A. Read instructions	included in 3A								
B. Plan activities	included in 3B								
C. Implement activities	included in 3B								
D. Develop record system	N/A								
E. Time to enter information									
• Records of startups, shutdowns, malfunctions, etc.	1.5	25 ^k	37.5	53	1,988	99	199	2,286	\$145,833
• Records of operating parameters	0.25	350 ^l	87.5	53	4,638	232	464	5,333	\$340,277
• Records of semiannual estimate of projected VOC use	1	2 ^m	2	11	22	1	2	25	\$1,614
• Records of 12 month actual VOC use	1	12 ^m	12	11	132	7	13	152	\$9,686
F. Train personnel	N/A								
G. Audits	N/A								
ONE-TIME BURDEN AND COST (SALARY) NATIONWIDE ^a					10,976	549	1,098	12,623	\$805,367

Footnotes

- a Costs assume a rate of \$64.60/hour for technical labor, \$95.32/hour for management labor, and \$40.09/hour for clerical labor.
- b There are a total of 53 existing plants subject to this NSPS. Assume that each existing plant has one solvent-borne coating operation subject to this NSPS. Assume that a total of 4 new coating lines per year will be installed at existing plants.
- c Assume one additional solvent-borne coating operation with VOC usage greater than 95Mg/yr per year will be installed at a new plant each year and will become subject to the standard in the next three years.
- d Assume that changes constituting modification or reconstruction making an existing coating operation and/or a coating mix preparation equipment (e.g., changes to an existing coating mix preparation equipment such as the replacement of a coating applicator or the oven and installing a new part) will not occur frequently. Therefore, we assume that each year 4 existing plus 1 new polymeric coating plants will undertake a change that constitutes modification or reconstruction.
- e Assume 20 percent of initial performance tests must be repeated due to failure (5 x 20% = 1).
- f If an affected facility is complying with the liquid-liquid material balance compliance method, monthly compliance determination are required to determine VOC used and recovered (by Method 24), and percent emission reduction. Assume that 3 lines over the three year period (one line per year) will demonstrate compliance with a liquid material balance method. Therefore, will be required to conduct monthly compliance tests. This method can only be used when a VOC recovery device controls only those emissions from one affected coated operation.
- g An affected facility claiming to use less than 95Mg per year or less than 130 Mg per year of VOC in the first year of operation shall submit actual VOC records at the end of the initial year. Assume there is one new water-borne line per year (which uses less than 95 Mg of VOC per year) being installed at existing plants over the 3 year period. This existing plant would be required to submit a notification of VOC use at the end of the initial year of operation of its new coating line. Also we assume that the new solvent-borne lines being installed use at least 130 Mg of VOC per year and are not required to notified actual VOC use at the end of the initial year.
- h Assume that 20 percent of the affected facilities (either complying with the emission reduction standard, the alternative standard and/or coating mix preparation equipment standard) report monitoring

- exceedances or periods of noncompliance quarterly. [$53 \times 20\% = 11$ (rounded)].
- i Assumes 80 percent of solvent-borne lines report no excess emissions semiannually. [$53 \times 80\% = 42$ (rounded)].
 - j No lines with projected VOC consumption of less than 95 Mg/yr or less than 130 Mg of VOC are expected to exceed the cutoff value in the future.
 - k Assume one occurrence of malfunction/shutdown per 2 weeks (50 weeks per year).
 - l Assume operating parameters recorded 350 days per year.
 - m Assume that 20 percent of the existing coating lines or "affected facilities" [$53 \times 20\% = 11$ (rounded)] claiming use of less than 95 Mg of VOC per year or less than 130 Mg of VOC per year, as well as the new water-borne line being installed per year are required to record semiannual estimates of the projected amount of VOC to be used for the manufacture of polymeric coated substrates at the affected coating operation that year and of actual 12-month VOC use.

TABLE 2. Annual Agency Burden and Cost: NSPS for Polymeric Coating of Supporting Substrates Facilities (40 CFR part 60, subpart VVV).

Activity	(A) Hours per occurrence	(B) Hours per line per year	(C) Respon- dents per year	(D) Technic al person- hours per year (D=B*C)	(E) Managem ent person- hours per year (E=D*0.05)	(F) Clerical person- hours per year (F=D*0.1)	(G) Total person- hours per year (G=D+E+F)	(H) Cost, \$ ^a
New Affected Facilities								
• Attend initial performance test ^{b+c}	12	12	5 ^d	60	3	6	69	\$2,729
• Attend repeat performance test ^e	12	12	1 ^f	12	0.6	1	14	\$546
• Review of notification of construction/reconstruction	2	2	5	10	0.5	1	12	\$455
• Review of notification of actual startup	2	2	5	10	0.5	1	12	\$455
• Review of notification of initial performance test ^{b+c+g}	2	2	5	10	0.5	1	12	\$455
• Review of notification of VOC use at the end of the initial year ^g	2	2	1	2	0.1	0.2	2	\$91
• Review of performance test results ^{b+c}	8	8	5	40	2	4	46	\$1,820
New and Existing Affected Facilities								
• Quarterly reports of monitoring exceedances and periods of noncompliance	8	32	11 ^h	352	18	35	405	\$16,012
• Semiannual reports of no excess emissions	2	4	42 ⁱ	168	8	17	193	\$7,642
• Report when 1st projected VOC use exceeds the applicable cutoff	2	2	2	4	0.2	0.4	5	\$182
• Report when 1st actual 12-month VOC use exceeds the applicable cutoff	2	2	0 ^j	0	0	0	0	\$0
• Notification of changes	2	2	1	2	0.1	0.2	2	\$91
TOTAL BURDEN AND COST ^g				670	34	67	771	\$30,478

Footnotes

- a Costs assume a rate of \$40.56/hour for technical labor, \$54.66/hour for management labor, and \$21.95/hour for clerical labor.
- b There are a total of 53 existing plants subject to this NSPS. Assume that each existing plant has one solvent-borne coating operation subject to this NSPS. Assume that a total of 4 new coating lines per year will be installed at existing plants.
- c Assume one additional solvent-borne coating operation with VOC usage greater than 95Mg/yr per year will be installed at a new plant each year and will become subject to the standard in the next three years.
- d A total of 5 new solvent-borne lines per year perform initial performance test.
- e Assume 20 percent of initial performance tests must be repeated due to failure ($5 \times 20\% = 1$).
- f Assume retests are attended by EPA personnel.
- g An affected facility claiming to use less than 95Mg per year or less than 130 Mg per year of VOC in the first year of operation shall submit actual VOC records at the end of the initial year. Assume there is one new water-borne line per year (which uses less than 95 Mg of VOC per year) being installed at existing plants over the 3 year period. This existing plant would be required to submit a notification of VOC use at the end of the initial year of operation of its new coating line. Also we assume that the new solvent-borne lines being installed use at least 130 Mg of VOC per year and are not required to notify actual VOC use at the end of the initial year.
- h Assume that 20 percent of the affected facilities (either complying with the emission reduction standard, the alternative standard and/or coating mix preparation equipment standard) report monitoring exceedances or periods of noncompliance quarterly. [$53 \times 20\% = 11$ (rounded)].
- j Assumes 80 percent of solvent-borne lines report no excess emissions semiannually. [$53 \times 80\% = 42$ (rounded)].
- k No lines with projected VOC consumption of less than 95 Mg/yr or less than 130 Mg of VOC are expected to exceed the cutoff value in the future.