

**SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY**

NESHAP for Miscellaneous Metal Parts and Products (40 CFR Part 63, Subpart M MMM) (Renewal)

1. Identification of the Information Collection

1(a) Title of the Information Collection

NESHAP for Miscellaneous Metal Parts and Products (40 CFR Part 63, Subpart M MMM) (Renewal), EPA ICR Number 2056.03, OMB Control Number 2060-0486

1(b) Short Characterization/Abstract

The National Emission Standards for Hazardous Air Pollutants (NESHAP) for the regulations at 40 CFR part 63, subpart M MMM were proposed on August 13, 2002 and promulgated on January 2, 2004. These regulations apply to each miscellaneous metal parts and products surface coating operations, and associated equipment or containers used for mixing, conveying, storage, or waste at existing facilities and new facilities. New facilities include those that commenced construction or reconstruction after the date of proposal. This information is being collected to assure compliance with 40 CFR part 63, subpart M MMM.

In general, all NESHAP standards 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 NESHAP standards.

Any owner or operator subject to the provisions of this part shall maintain a file of these documents, and retain the file for at least five years following the date of such notifications, 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 4,991 respondents are currently subject to the regulation, and it is estimated that due to current economic conditions, no additional respondents will become subject to the regulation in each of the next three years.

The Office of Management and Budget (OMB) approved the currently active Information Collection Requests (ICR) without any "Terms of Clearance".

2. Need for and Use of the Collection

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.

The predominant hazardous air pollutants (HAP) emitted from miscellaneous metal parts and products surface coating operations include xylenes, toluene, methyl ethyl ketone, phenol, and cresols/cresylic acid. In the Administrator's judgement, the pollutants emitted from miscellaneous metal parts and products surface coating operations cause or contribute to air pollution that may reasonably be anticipated to endanger public health or welfare. Therefore, the NESHAP for this source category were promulgated at 40 CFR part 63, subpart MMMM.

2(b) Practical Utility/Users of the Data

The control of emissions of HAP from miscellaneous metal parts and products surface coating operations requires not only the installation of properly designed equipment, but also the operation and maintenance of that equipment. Emissions of HAP from miscellaneous metal parts and products surface coating operations result from the coating operations, and associated equipment or containers used for mixing, conveying, storage, or waste. These standards rely on compliant coatings, emission capture systems, add-on controls, and work practice standards. The required notifications are used to inform the Agency or delegated authority when a source becomes subject to the standard. The reviewing authority may then inspect the source to check if the pollution control devices are properly installed and operated and the regulations are being met. Performance test reports are needed as these are the Agency's record of a source's initial capability to comply with the emission standard, and serve as a record of the operating conditions under which compliance was achieved. The semiannual reports are used for problem identification, as a check on source operation and maintenance, and for compliance determinations. The information generated by the monitoring, recordkeeping and reporting requirements described in this ICR is used by the Agency to ensure that facilities affected by the

NESHAP continue to operate the control equipment in compliance with the regulation. Adequate monitoring, recordkeeping, and reporting are necessary to ensure compliance on an on-going basis with these standards, as required by the Clean Air Act. The information collected from recordkeeping and reporting requirements also is used for targeting inspections, and is of sufficient quality to be used as evidence in court.

3. Non-duplication, Consultations, and Other Collection Criteria

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

3(a) Non-duplication

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 on May 30, 2008, (73 FR 31088). No comments were received.

3(c) Consultations

The burden estimates in the previous ICR were developed with the extensive participation and consultation with miscellaneous metals surface coating industry representatives during rulemaking for 40 CFR part 63, subpart MMMM. EPA consulted the National Electrical Manufacturers Association (NEMA, Sarah Owen: 703-841-3245) to update, as needed, these estimates. NEMA also provided comments on this renewal. In response to comments from NEMA, EPA revised the Operation and Maintenance (O&M) costs to reflect add-on controls installed by the small portion of industry that does not reformulate its coating materials. We also updated other sections of the ICR to be consistent with the information provided by NEMA.

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.

These standards require the respondents 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. The retention of records for five years allows EPA to establish the compliance history of a source, any pattern of non-compliance and to determine the appropriate level of enforcement action. EPA has found that the most flagrant violators have violations extending beyond the five years. In addition, EPA would be prevented from pursuing the violators due to the destruction or nonexistence of essential records.

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

Respondents of the recordkeeping and reporting requirements are owners or operators of facilities that perform surface coating of miscellaneous metal parts and products and that are classified as major sources under section 112 of the Clean Air Act. In general, facilities that coat miscellaneous metal parts and products are covered under the North American Industrial Classification System (NAICS) and Standard Industrial Classification (SIC) codes are listed in the table below. However, facilities classified under other NAICS or SIC codes may be subject to the proposed standard if they meet the applicability criteria. Not all facilities classified under the NAICS and SIC codes in the table will be subject to the proposed standard because some of the classifications cover products outside the scope of the NESHAP for miscellaneous metal parts and products.

Segment	Description	Example Products	Example SIC	Example NAICS
Aerospace Equipment	Engines and Turbines, Aircraft Engines and Engine Parts, Aircraft Parts and Auxiliary Equipment	Aircraft Engines, Aircraft Parts, Aerospace Ground Equipment	3724, 3728, 376X,	336413, 336414, 336415, 54171
Automobile Parts	Motor Vehicles and Motor Vehicle Equipment	Engine Parts, Vehicle Parts and Accessories, Brakes, Axles, etc.	3711, 3713, 3714, 3292, 3429, 3465, 3694, 3829	335312, 336111, 336211, 336312, 33632, 33633, 33634, 33637, 336399
Extruded Aluminum	Rolling, Drawing, and Extruding of Nonferrous Metals	Extruded Aluminum, Architectural Components, Coils, Rod, and Tubes	3354, 3365, 3442, 3446	331316, 331524, 332321, 332323
Heavy Equipment	Farm and Garden Machinery and Equipment, Construction Machinery and Equipment	Tractors, Earth moving machinery	3511, 3519, 352X, 353X,	33312, 333611, 333618
Job Shops	Coat Products by Job and Customer Rather than Coating the One Product or Group of Products	Any of the Products from the MMPP Segments	3441, 3471, 3499, 3999	332312, 332722, 332813, 332991, 332999, 334119, 336413, 339999
Large Trucks and Buses	Motor Vehicles and Motor Vehicle Equipment	Large Trucks, Buses	3711, 3713, 3716	33612, 336211
Magnet Wire	Rolling, Drawing, and Extruding of Nonferrous Metal Wire	Magnet Wire	3351, 3357	331319, 331422, 335929
Metal Buildings	Prefabricated Metal Buildings and Components	Prefabricated Metal: Buildings, Carports, Docks, Dwellings, Greenhouses, Panels for Buildings	3448	332311

Segment	Description	Example Products	Example SIC	Example NAICS
Metal Containers	Metal Shipping Barrels, Drums, Kegs, and Pails	Drums, Kegs, Pails, Shipping Containers	2655, 3089, 3325, 3412, 3443, 5085	33242, 81131, 322214, 326199, 331513, 332439
Metal Pipe and Foundry	Primary Metal Industries	Plate, Tube, Rods, Nails, Spikes, etc.	331X, 332X, 336X, 3399	331111, 331513, 33121, 331221, 331511
Rail Transportation	Transportation Equipment	Brakes, Engines, Freight Cars, Locomotives	3731, 3743, 4011, 4741	33651, 336611, 482111
Recreational Vehicles	Transportation Equipment	Motorcycles, Motor Homes, Semitrailers, Truck Trailers	3083, 3354, 3713, 3714, 3716, 375X, 3792	3369, 331316, 336991, 336211, 336112, 336213, 336214, 336399
Rubber to Metal Products	Fabricated Rubber Products (applied to metal)	Engine Mounts, Rubberized Tank Tread, Harmonic Balancers	3061, 3069, 3479	326291, 326299
Structural Steel	Fabricated Structural Metal Products	Joists, railway bridge sections, highway bridge sections	3441, 3448	332311, 332312
Other Transportation Equipment	Transportation Equipment Not Listed Otherwise	Miscellaneous Transportation Related Equipment and Parts	3711, 3519, 3714, 3715, 3795, 3621,	336212, 336999, 33635, 56121, 8111, 56211

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 MMMM.

A source must make the following reports:

Notification Reports	
Requirement	Regulation Reference
Initial Notification	63.3910(b)
Notification of Compliance Status	63.3910(c)
Notification of construction or reconstruction	63.9(b)

Notification Reports	
Requirement	Regulation Reference
Notification of actual date of initial startup	63.9(b)
Notification of intent to conduct a performance test	63.7(b); 63.9(e); 63.3910(a)
Periodic reports (semiannual)	63.3920(a)
Statement of compliance (if no exceedances occurred)	63.3920(a)
Average monitoring data for any periods where exceedances or excursions occur	63.3920(a)
Periods of monitoring system downtime	63.3920(a)
Results of any performance tests	63.3920(b)
Startup, shutdown, malfunction reports	63.3920(c)

A source must maintain the following records:

Recordkeeping	
Five-year retention of records	63.10(b)(1)
Material formulation data	63.3930(b)
Records of HAP content calculations	63.3930(c)
Copies of Notifications and Reports	63.3930(a)
Records of names of materials used	63.3930(d)
HAP fractions in each material used	63.3930(e)
Coating solids fraction in each material used	63.3930(f)
Density of materials used	63.3930(g)
Documentation of waste material shipped offsite	63.3930(h)
Startup, shutdown, and malfunction plan/records	63.6(e)(3); 63.3900(c); 63.3930(k)
Documentation of control device performance tests	63.10(b)(2); 63.3930(k)
Values measured by continuous monitoring systems	63.3968
Monitoring system calibrations, maintenance	63.3968
Periods of monitoring system failure/shutdown	63.3968

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 20% of the respondents use electronic reporting.

(ii) Respondent Activities

Respondent Activities
Read instructions.
Install, calibrate, maintain, and operate CPMS for capture system and add-on control device efficiency at sources using these to comply with the standard.
Perform initial performance test, Reference Method 1, 1A, 2, 2A, 2C, 2D, 2F, 2G, 3, 3A, 3B, 4, 24, 25, 25A, 204, 204A, 204B, 204C, 204D, 204E, 204F or 311 test as applicable, and repeat performance tests if necessary.
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 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, 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 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 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 over 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

A majority of the respondents are large entities (e.g., 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 Miscellaneous Metal Parts and Products (40 CFR Part 63, Subpart MMMM) (Renewal).

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.

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 2,328,603 hours (Total Labor Hours calculated 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 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	\$111.43 (\$53.04 + 110%)
Technical	\$94.33 (\$44.92 + 110%)
Clerical	\$45.28 (\$21.56 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, March 2008, "Table 2: Civilian Workers, 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/Start-up 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/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)
CPMS – magnet wire facilities	\$0	0	\$0	\$50,000	10	\$500,000
CPMS – other facilities ¹	\$0	0	\$0	\$5,000	100	\$500,000

¹ An estimated 2 percent of non-magnet wire facilities have installed add-on control devices. Other facilities comply with the standards by reformulating their coating materials.

The total capital/startup costs for this ICR are \$0. This is the total of column D in the above table.

The total operation and maintenance (O&M) costs for this ICR are \$1,000,000. 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 is estimated to be \$1,000,000.

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 \$5,943,143 (calculated from Table 2).

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

Managerial	\$59.63	(GS-13, Step 5, \$37.27 + 60%)
Technical	\$44.24	(GS-12, Step 1, \$27.65 + 60%)
Clerical	\$23.94	(GS-6, Step 3, \$14.96 + 60%)

These rates are from the Office of Personnel Management (OPM) "2008 General Schedule", which excludes locality rates of pay. The rates have been increased by 60 percent to account for the benefit packages made available to government employees. Details upon which this estimate is based appear in Table 2: Annual Agency Burden and Cost, NESHAP for Miscellaneous Metal Parts and Products (40 CFR Part 63, Subpart MMMM) (Renewal).

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

Based on our research for this ICR, approximately 4,991 existing sources are currently subject to the standard. It is estimated that no additional sources will become subject to the standard 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	0	4,991	0	0	4,991
2	0	4,991	0	0	4,991
3	0	4,991	0	0	4,991
Average	0	4,991	0	0	4,991

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 4,991.

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
Initial notification	0	1	0	0
Notification of performance test	0	1	0	0
Notification of compliance status	0	1	0	0
Semiannual report	4,991	2	0	9,982
			Total	9,982

The number of Total Annual Responses is 9,982 (rounded).

The total annual labor costs are \$211,456,370. Details regarding these estimates may be found in Table 1: Annual Respondent Burden and Cost, NESHAP for Miscellaneous Metal Parts and Products (40 CFR part 63, subpart M) (Renewal), attached.

The total annual capital/startup and O&M costs to the regulated entities are \$1,000,000. 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 the next three years is estimated to be 137,751 labor hours at a cost of \$5,943,143. See Table 2: Annual Agency Burden and Cost, NESHAP for Miscellaneous Metal Parts and Products (40 CFR Part 63, Subpart M), (Renewal), 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 Table 2, respectively, and summarized below.

(i) Respondent Tally

The total annual labor costs are \$211,456,370. Details regarding these estimates may be found in Table 1: Annual Respondent Burden and Cost, NESHAP for Miscellaneous Metal Parts and Products (40 CFR Part 63, Subpart M) (Renewal), attached. Furthermore, the annual public reporting and recordkeeping burden for this collection of information is estimated to average 233 hours per response.

The total annual capital/startup and O&M costs to the regulated entity are \$1,000,000. 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 137,751 labor hours at a cost of \$5,943,143. See Table 2: Annual Agency Burden and Cost, NESHAP for Miscellaneous Metal Parts and Products (40 CFR Part 63, Subpart M) (Renewal), attached.

6(f) Reasons for Change in Burden

There is an increase in burden of 1,653,553 hours from the most recently approved ICR, due to an adjustment. This increase is not due to any program changes. The increase is due to two factors. First, there is a more accurate count of number of facilities affected. Secondly, there is a change in the burden and cost estimates because the standard has been in effect for more than three years, and the requirements are different during initial compliance (new facilities) as compared to on-going compliance (existing facilities). The previous ICR reflected those burdens and costs associated with the initial activities for subject facilities. This includes purchasing monitoring equipment, conducting performance tests, and establishing recordkeeping systems. This ICR reflects the on-going burden and costs for existing facilities. Activities for existing source include continuous monitoring of pollutants and the submission of semiannual reports.

Capital/Startup vs. Operation and Maintenance (O&M) costs have also been revised to

reflect add-on controls installed by the small portion of industry that does not reformulate its coating materials in order to comply with the rule.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 233 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-2008-0288. 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 Avenue, 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) 566-1927. 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-2008-0288 and OMB Control Number 2060-0486 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 - NESHAP for Miscellaneous Metal Parts and Products (40 CFR Part 63, Subpart M) (Renewal)

Burden Item	(A) Person-hours per occurrence	(B) Number of occurrences per year	(C) Person-hrs. per respondent per year (C=A*B)	(D) Respondents per year	(E) Technical person-hrs. per year (E=C*D)	(F) Management person-hrs. per year (F=E*0.05)	(G) Clerical person-hrs. per year (G=E*0.1)	(H) Annual costs (\$)
1.0 Read Rule and Instructions	4	1	4	0	0	0	0	\$0
2.0 Plan Activities	8	1	8	0	0	0	0	\$0
3.0 Training	8	1	8	0	0	0	0	\$0
4.0 Create, Test, and Research and Development	0	1	0	0	0	0	0	\$0
5.0 Gather Information and Monitor	18	12	216	4,981	1,075,896	53,795	107,590	\$112,355,281
5.1 Gather Information and Monitor - Magnet Wire Facilities ¹	360	12	4,320	10	43,200	2,160	4,320	\$4,511,354
6.0 Process/Compile and Review	12	12	144	4,981	717,264	35,863	71,726	\$74,903,521
6.1 Process/Compile and Review - Magnet Wire Facilities ¹	240	12	2,880	10	28,800	1,440	2,880	\$3,007,570
7.0 Complete Semiannual Reports	8	2	16	4,991	79,856	3,993	7,986	\$8,339,322
8.0 Record/Disclose	4	2	8	4,991	39,928	1,996	3,993	\$4,169,661
9.0 Store/File	4	2	8	4,991	39,928	1,996	3,993	\$4,169,661
10.0 LDAR Reporting and Recordkeeping	0	0	0	0	0	0	0	\$0
TOTAL BURDEN (HRS) AND COSTS	666	58	7,612	44,919	2,024,872	101,243	202,488	\$211,456,370
						2,328,603		

Footnotes

¹ The ten magnet wire facilities on average incorporate approximately 20 times the number of processes typical for the industry. Accordingly, burden of gathering information, monitoring, and processing, compiling, and reviewing has been estimated at 20 times the industry average per facility.

Table 2. Annual Agency Burden and Cost - NESHAP for Miscellaneous Metal Parts and Products (40 CFR Part 63, Subpart Mmmm) (Renewal)

Burden Item	(A) Person-hours per activity	(B) Number of activities per year	(C) Technical person-hours per year (C=A*B)	(D) Management person-hours per year (D=C*0.05)	(E) Clerical person-hours per year (E=C*0.1)	(F) Annual costs (\$/yr)
1.0 Initial performance and test	N/A	0	0	0	0	0
2.0 Repeat performance test	N/A	0	0	0	0	0
3.0 Report review						
a) Initial Notification	8	0	0	0	0	0
b) Notification of Performance Test	N/A	0	0	0	0	0
c) Notification of Compliance Status	12	0	0	0	0	0
d) Semiannual Report	12	9,982	119,784	5,989	11,978	\$5,943,143
Total Burden (Hrs) and Costs			119,784	5,989	11,978	\$5,943,143
				137,751		