

**SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY**

NSPS for Metal Furniture Coating (40 CFR Part 60, Subpart EE) (Renewal)

1. Identification of the Information Collection

1(a) Title of the Information Collection

NSPS for Metal Furniture Coating (40 CFR Part 60, Subpart EE) (Renewal),
EPA ICR Number 0649.10, OMB Control Number 2060-0106

1(b) Short Characterization/Abstract

The New Source Performance Standards (NSPS) for Metal Furniture Coating (40 CFR Part 60, Subpart EE) were proposed on November 28, 1980, and promulgated on October 29, 1982. These regulations apply to each metal furniture surface coating operation in which organic coatings are applied (greater than 3,842 liters of coating per year), commencing construction, modification or reconstruction after November 28, 1980. This information is being collected to assure compliance with 40 CFR part 60, subpart EE.

In general, all 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 400 sources are currently subject to the regulation, and it is estimated that no additional sources per year will become subject to the regulation in the next three years. These numbers are based on consultations with the industry and a recent search of the Agency's Air Facility System (AFS) database.

OMB approved the currently active Information Collection Request (ICR) without any "Terms of Clearance."

The "Affected Public" are private sector businesses that coat metal furniture. The burden to the "Affected Public" may be found below in Table 1: Annual Respondent Burden and Cost: New Source Performance Standard (NSPS) for Metal Furniture Coating (40 CFR Part 60, Subpart EE) (Renewal). The burden to the "Federal Government" burden is attributed entirely to work performed by Federal employees or government contractors, and may be found below in

Table 2: Annual Average Agency Burden and Cost: New Source Performance Standard (NSPS) for Metal Furniture Coating (40 CFR Part 60, Subpart EE) (Renewal).

2. Need for and Use of the Collection

2(a) Need/Authority for the Collection

The Clean Air Act (CAA) provides authority to the Agency to establish standards to control air pollution and to ensure compliance with promulgated regulations through adequate recordkeeping and reporting by the affected industries (i.e., respondents). The regulations include: the NSPS under section 111 of the Act; the National Emission Standards for Hazardous Air Pollutants (NESHAP) which includes the original NESHAP standards and the more recent Maximum Achievable Control Technology (MACT) or NESHAP-MACT standards under section 112 of the Act; and emission guidelines for the designated types incinerators under section 129 of the Act.

2(b) Practical Utility/Users of the Data

The recordkeeping and reporting requirements in the standards are used by regulatory agencies, the public and the regulated community for a variety of reasons including the determination of the respondent's compliance status, analytical studies to demonstrate compliance trends, and evaluations regarding the efficacy of the promulgated regulations.

The required recordkeeping and reporting are also used to: 1) certify compliance with the regulations; 2) determine the respondent's compliance with the designated emission limitations; 3) notify regulatory agencies when a standard is violated; 4) evaluate continuous compliance through the use of emission or operational parameter monitors; and 5) ensure that plant personnel are following the required procedures and are periodically trained, as indicated.

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

The recordkeeping and reporting requested are required under 40 CFR part 60, subpart EE.

3(a) Non-duplication

The standards do not require duplication in the collection and reporting of information. If the subject standards have not been delegated, the information is sent directly to the appropriate United States Environmental Protection Agency (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.

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 (74 FR 32580) on July 8, 2009. No comments were received on the burden published in the Federal Register.

3(c) Consultations

The Agency has taken a number of steps to determine if consultations are needed to estimate the burden to industry. 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. The Agency's internal 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. Based on this information, we have concluded that additional consultations would not change our estimate of burden.

The Agency's primary source of information as reported by industry, in compliance with the recordkeeping and reporting provisions in the standard, is the AFS (AIRS Facility Subsystem) which is operated and maintained by the EPA Office of Compliance. AFS is the EPA database for the collection, maintenance, and retrieval of all compliance data. Approximately 48 respondents are currently subject to the regulation, and our consultations with Agency industry experts regarding the growth rate for the industry indicated that an additional zero respondents per year will become subject to the regulation over the next three years.

It should be noted that the respondents, the industry trade associations and other interested parties were provided an opportunity to comment on the burden associated with the standard as it was being developed, and the standard has been previously reviewed to determine the minimum information needed for compliance purposes.

3(d) Effects of Less Frequent Collection

The effect of less frequent collection would be a decrease in the margin of assurance that facilities are achieving the emission reductions mandated by the CAA through the promulgation of the applicable regulations. In addition, the likelihood of detecting the poor operation and maintenance of control equipment decreases, and the detection of noncompliance becomes problematic.

3(e) General Guidelines

Neither the reporting nor recordkeeping requirements violate the regulations established by the Office of Management and Budget (OMB) at 5 CFR part 1320, section 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 part 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 recordkeeping and reporting requirements do not contain sensitive questions.

4. The Respondents and the Information Requested

4(a) Respondents/SIC Codes

The respondents of the record keeping and reporting requirements are facilities which conduct surface coating of metal furniture. The United States Standard Industrial Classification (SIC) and corresponding North American Industry Classification System (NAICS) codes for the respondents affected by the standards are shown in the table below.

Regulation	SIC Codes	NAICS Codes
40 CFR part 60, subpart EE	2514	337124, 337215
	2522	337214
	2531	337127
	2542	337127, 337215

4(b) Information Requested

(i) Data Items

All data in this ICR that is recorded and/or reported is required by subpart EE - New Source Performance Standards (NSPS) for Surface Coating of Metal Furniture, 40 CFR part 60, subpart EE.

A source must make the following reports:

Reports for 40 CFR part 60, subpart EE	
Notification of construction/reconstruction	60.7(a)(1)
Actual startup	60.7(a)(3)
Notification of initial performance test	60.8(d)
Initial performance test results	60.8(a)
Notification of actual startup	60.7(a)(3)
Demonstration of continuous monitoring system	60.7(a)(5)
Notification of a physical or operational change.	60.7(a)(4)

Reports for 40 CFR part 60, subpart EE	
Semiannual report	60.7(d)
Excess emissions report	60.7(c), 60.315(b)

A source must maintain the following records:

Recordkeeping for 40 CFR part 60, subpart EE	
Startups, shutdowns, malfunctions, periods where the continuous monitoring system is inoperative.	60.7(b)
Records are required to be retained for two years at the facility.	60.315(d)
Maintain a file of all measurements including the monitoring device, and performance testing measurements, and monitoring device calibrations, checks, adjustments and maintenance performed on these devices.	60.7(e)
Maintain a file of all data and calculations used to determine VOC emissions.	60.315(d)
Maintain daily records of incinerator combustion temperature, or amounts of solvent recovered.	60.315(d)

Electronic Reporting

Some of the respondents are using monitoring equipment that automatically records parameter data. Although personnel at the affected facility must still evaluate the data, internal automation has significantly reduced the burden associated with monitoring and recordkeeping at a plant site.

Also, regulatory agencies in cooperation with the respondents continue to create reporting systems to transmit data electronically. However, electronic reporting systems are not widely used. At this time, it is estimated that 10 percent of the respondents use electronic reporting.

(ii) Respondent Activities

Respondent Activities
Read instructions.
Install, calibrate, maintain, and operate CMS for temperature for incinerator.

Respondent Activities
Perform initial performance test, Reference Method 24 test, 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 AFS.

5(b) Collection Methodology and Management

The required data and reports can be evaluated on-site by conducting a partial compliance evaluation, full compliance evaluation or inspection, or through an off-site review of compliance monitoring records and reports. Evaluation reports and inspection results are maintained by the

Agency or delegated authority.

The results of these evaluations are 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 delegated authorities can retrieve and analyze the data.

5(c) Small Entity Flexibility

A majority of the affected facilities 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 below in Table 1.

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. 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 respondent burden is shown below in Table 1. The labor hours in Table 1 are based on Agency studies and background documents from the development of the regulation, Agency knowledge and experience with the standard, 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, 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/Startup and Operation and Maintenance Costs

The type of industry costs associated with the information collection activity in the regulations are labor and Continuous Emission Monitors (CEMS). 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 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 Costs, (B X C)	(E) Annual O&M Cost for One Respondent	(F) Number of Respondents with O&M	(G) Total O&M Costs, (E X F)
Temperature	4,400	0	\$0	\$2,100	400	\$840,000

The total capital/startup costs for this ICR is the total of column D.

The total operation and maintenance (O&M) costs for this ICR is the total of column G.

6(c) Estimating Agency Burden and Cost

The only costs to the Agency are those 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 and the publication and distribution of collected information.

The average annual Agency cost during the three years of the ICR is shown below in Table 2.

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) “2006 General Schedule” which excludes locality rates of pay.

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

Number of Respondents					
	Respondents That Submit Reports		Respondents That Do Not Submit Any Reports		
Year	(A) Number of New Respondents	(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	400	0	0	400
2	0	400	0	0	400
3	0	400	0	0	400
Average	0	400	0	0	400

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

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

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	0	1	0	0
Notification of performance test	0	1.2	0	0
Notification of actual startup	0	1	0	0
Report of performance test	0	1.2	0	0
Semiannual report	400	2	0	800
Excess emissions report	80	2	0	160
			Total	960

The number of Total Annual Responses is shown in column D.

The total annual labor cost may be found below in Table 1.

The average annual Agency burden and cost over next three years is shown below in Table 2.

6(e) Bottom Line Burden Hours and Cost Tables

(i) Respondent Tally

The total annual labor hours are 56,074. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost: New Source Performance Standard (NSPS) for Metal Furniture Coating (40 CFR Part 60, Subpart EE) (Renewal). Furthermore, the annual public reporting and recordkeeping burden for this collection of information is estimated to average 58 hours per response.

(ii) The Agency Tally

The average annual Agency burden and cost over next three years is estimated to be 2,208 labor hours at a cost of \$91,404. See below Table 2: Annual Agency Burden and Cost: New Source Performance Standard (NSPS) for Metal Furniture Coating (40 CFR Part 60, Subpart EE) (Renewal).

The bottom line burden hours and cost tables for both the Respondents and Agency are attached below and are shown in Tables 1 and 2, respectively, and summarized below.

6(f) Reasons for Change in Burden

There is no change in the burden hours or cost to the respondents in this ICR compared to the previous ICR. This is due to two considerations: 1) the regulations have not changed over the past three years and are not anticipated to change over the next three years; and 2) the growth rate for the respondents is very low, negative or nonexistent. Therefore, the labor hours and cost figures in the previous ICR reflect the current burden to the respondents and are reiterated in this ICR.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 58 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 currently valid OMB control number. The OMB control numbers for EPA's regulations are listed in 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-2009-0389. 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-2009-0389 and OMB Control Number 2060-0106 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: NEW SOURCE PERFORMANCE STANDARD (NSPS) FOR METAL FURNITURE COATING (40 CFR PART 60, SUBPART EE) (RENEWAL)

	REPORTING/ RECORDKEEPING REQUIREMENT	Hours/ Occurrence (A)	Occurrences/ Year (B)	Hours/Year (C=AxB) (C)	Respondents/ Year (D)	Technical Person Hours (E=CxD)	Managerial Person Hours (Ex0.05)	Clerical Person Hours (Ex0.10)	Total Costs/Year (F)
1.	APPLICATIONS	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
2.	SURVEY AND STUDIES	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
3.	REPORTING REQUIREMENTS								
	a. Read Instructions	1	1	1	0	0	0	0	\$0
	b. Required Activities								
	Initial Performance Tests	60	1	60	0	0	0	0	\$0
	Repeat of Performance Tests	60	0.2	12	0	0	0	0	\$0
	c. Gather Existing Information								
	d. Write Report								
	Notification of Construction/ Reconstruction	2	1	2	0	0	0	0	\$0
	Notification of Initial Performance Test	2	1	2	0	0	0	0	\$0
	Notification of Actual Startup	2	1	2	0	0	0	0	\$0
	Report of Performance Test								
	Semiannual Report	8	2	16	400	6,400	320	640	\$623,363
	Excess Emissions Report	16	2	10	80	2,560	128	256	\$249,345
	TOTAL REPORTING BURDEN						10,304		\$872,708
4.	RECORDKEEPING REQUIREMENTS								
	a. Read Instructions								
	b. Plan Activities								
	c. Implement Activities (Monthly Performance Test)	1	12	12	400	4,800	240	480	\$467,522
	d. Develop Record System	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
	Records of Operating Parameter	0.25	350	87.5	400	35,000	1,750	3,500	\$3,409,018

TABLE 1: ANNUAL RESPONDENT BURDEN AND COST: NEW SOURCE PERFORMANCE STANDARD (NSPS) FOR METAL FURNITURE COATING (40 CFR PART 60, SUBPART EE) (RENEWAL)									
	REPORTING/ RECORDKEEPING REQUIREMENT	Hours/ Occurrence (A)	Occurrences/ Year (B)	Hours/Year (C=AxB) (C)	Respondents/ Year (D)	Technical Person Hours (E=CxD)	Managerial Person Hours (Ex0.05)	Clerical Person Hours (Ex0.10)	Total Costs/Year (F)
	TOTAL RECORDKEEPING BURDEN						45,770		\$3,876,540
	SUBTOTAL ANNUAL BURDEN					48,760	2,438	4,876	
	GRAND TOTAL						56,074		\$4,749,248

TABLE 2: ANNUAL AGENCY BURDEN AND COST: NEW SOURCE PERFORMANCE STANDARD (NSPS) FOR METAL FURNITURE COATING (40 CFR PART 60, SUBPART EE) (RENEWAL)								
REPORTING/RECORDKEEPING REQUIREMENT	EPA Hours/Occurrence (A)	Occurrences /Plant/Year (B)	EPA Hours/ Year (C=A*B)	Plants/Year (D)	Technical Person Hours (E=CxD)	Managerial Person Hours (Ex0.05)	Clerical Person Hours (Ex0.10)	Total Costs/Year (F)
INITIAL PERFORMANCE TESTS								
New Plant	24	1	24	0	0	0	0	\$0
REPEAT PERFORMANCE TEST								
New Plant	24	0.2	4.8	0	0	0	0	\$0
REPORT REVIEW								
New Plants								
Notification of Construction	2	1	2	0	0	0	0	\$0
Notification of Initial Startup	0.5	1	0.5	0	0	0	0	\$0
Notification of Actual Startup	0.5	1	0.5	0	0	0	0	\$0
Notification of Initial Test	0.5	1.2	0.6	0	0	0	0	\$0
Review Test Results	8	1.2	9.6	0	0	0	0	\$0
Existing Plants								
Semiannual Reports	2	2	4	400	1,600	80	160	\$76,170
Excess Emissions Reports	2	2	4	80	320	16	32	\$15,234
SUBTOTAL ANNUAL BURDEN					1,920	96	192	\$91,404
GRAND TOTAL						2,208		