

**SF-83 SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY**

NSPS for Surface Coating of Large Appliances (40 CFR Part 60, Subpart SS)

1. Identification of the Information Collection

1(a) Title of the Information Collection

NSPS for Surface Coating of Large Appliances (40 CFR Part 60, Subpart SS)

1(b) Short Characterization/Abstract

The New Source Performance Standards (NSPS) for Large Appliance Surface Coating (40 CFR part 60, subpart SS) were proposed on December 24, 1980, and promulgated on October 27, 1982. These regulations apply to large appliance coating facilities commencing construction, modification or reconstruction after December 24, 1980. This information is being collected to assure compliance with 40 CFR part 60, subpart SS.

In general, all NSPS require initial notifications, performance tests, and periodic reports. Owners or operators also are 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 appropriate United States Environmental Protection Agency (EPA) regional office.

Approximately 72 sources currently are 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 previous experience with the industry and a search of the Agency's Air Facility Subsystem (AFS) database during a previous renewal.

OMB approved the current ICR without any Terms of Clearance.

The burden to the "Affected Public" may be found in Table 1: Annual Respondent Burden and Cost. The burden to the "Federal Government" is attributed entirely to work performed by federal employees or government contractors; this burden may be found in Table 2: Average Annual EPA Burden.

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 New Source Performance Standards (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 of incinerators under section 129 of the Act.

2(b) Practical Utility/Users of the Data

The recordkeeping and reporting requirements in the standard(s) 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 limitation(s); 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. Nonduplication, Consultations, and Other Collection Criteria

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

3(a) Nonduplication

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 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 38004) on July 30, 2009. No comments were received on the burden published in the Federal Register.

3(c) Consultations

During a previous renewal of this ICR, several consultations were conducted. Comments received including those submitted in response to the first federal register notice announcing the previous renewal of this ICR were reviewed. The Agency's internal industry experts were consulted. The Agency's internal data sources and any projections of industry growth over the next three years were also considered.

The Agency's primary source of information as reported by industry, in compliance with the recordkeeping and reporting provisions in the standard, is the Air Facility Subsystem (AFS), which is operated and maintained by EPA's Office of Compliance. AFS is EPA's database for the collection, maintenance, and retrieval of all compliance data. There are currently 72 sources 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, while an equal number will go off-line during this time period.

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 previously has been 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 could become 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. However, most NESHAP standards and a few NSPS standards require records to be kept more than three years. In general, these standards require the respondents to maintain all records, including reports and notifications, for five years. The five-year record retention requirement is consistent with the permit program at 40 CFR part 70, 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 the respondent for purposes of determining the appropriate level of enforcement action.

Historically, EPA notes that the most flagrant violations have extended beyond a five-year period. If records are retained for less than five years, EPA would be deterred from pursuing the most flagrant violations due to the destruction of records documenting noncompliance.

3(f) Confidentiality

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

3(g) Sensitive Questions

The 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 SS	3631	335221
	3632	335222
	3633	335224
	3639	335212, 333298, 335228

4(b) Information Requested

(i) Data Items

All data in this ICR that is recorded and/or reported is required by subpart SS, New Source Performance Standards (NSPS) for Large Appliance Surface Coating, 40 CFR part 60, subpart SS.

A source must make the following reports:

Reports for 40 CFR part 60, subpart SS	
Notification of construction/reconstruction	60.7(a)(1)
Notification of initial performance test	60.8(d)
Initial performance test results	60.8(a), 60.455(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)
Semiannual report	60.7(d)
Excess emissions report	60.7(c), 60.455(b), 60.455(c)

A source must maintain the following records:

Recordkeeping for 40 CFR part 60, subpart SS	
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.	60.455(d)
Maintain a file of all measurements including the monitoring device, performance testing measurements, and monitoring device calibrations, checks, adjustments and maintenance performed on these devices. Monthly performance test.	60.7(e), 60.453(a), 60.7(d)
Maintain daily records of incinerator combustion temperature, or amounts of solvent recovered.	60.454(a)(3), 60.455(d)

(ii) Respondent Activities

Respondent Activities
Read instructions.
Install, calibrate, maintain, and operate a device that continuously records the combustion temperature of any effluent gases incinerated to achieve compliance.
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 AIRS (Aerometric Information Retrieval System) Facility Subsystem (AFS) database.

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 Air Facility Subsystem (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. According to the promulgated rule notice in the Federal Register (47 FR 47779) on October 27, 1982, industry growth is expected to be confined to major manufacturers; the acquisition trend is also expected to continue as small manufacturers, unable to compete with mass producers, become prime candidates for acquisition. Assuming this predicted trend has continued, it is not likely that a significant number of small businesses are currently subject to this 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: Annual Respondent Burden and Cost.

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.

6(a) Estimating Respondent Burden

The respondent burden is shown 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% 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 ¹	(G) Total O&M Costs, (E X F)
Temperature	8,000	0	\$0	\$2,100	4	\$8,400

¹ Five percent of facilities use incineration

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 in Table 2, attached.

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

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

These rates are from the Office of Personnel Management (OPM) A2006 General Schedule@ which excludes locality rates of pay.

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

Number of Respondents					
Year	Respondents That Submit Reports		Respondents That Do Not Submit Any Reports	(D) Number of Existing Respondents That Are Also New Respondents	(E) Number of Respondents (E=A+B+C-D)
	(A) Number of New Respondents ¹	(B) Number of Existing Respondents	(C) Number of Existing Respondents That Keep Records but Do Not Submit Reports		
1	0	72	0	0	72
2	0	72	0	0	72
3	0	72	0	0	72
Average	0	72	0	0	72

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 D.

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

Total Annual Responses				
(A) Information Collection Activity	(B) Number of Respondents	(C) Number of Responses	(D) Number of Existing Respondents That Keep Records But Do Not Submit Reports	(E) Total Annual Responses $E=(B \times C)+D$
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	72	2	0	72
Temperature variance report	72	2	0	72
			Total	144

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

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

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

6(e) Bottom Line Burden Hours and Cost Tables

The bottom line burden hours and cost tables for both the Agency and the respondents are attached.

6(f) Reasons for Change in Burden

There is no change in the labor hours to the respondents in this ICR compared to the previous ICR. 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 respondents is very low, negative, or non-existent. Therefore, the labor hours in the previous ICR reflect the current burden to the respondents and are reiterated in this ICR. There is a minor change to the cost figures, since the previous ICR rounded to the nearest \$1,000; this ICR presents cost figures which differ by less than \$500 from the previous ICR due to using exact figures instead of rounding.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 53 hours per response. Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, disclose, or provide information to

or for a Federal agency. This includes the time needed to review instructions; to 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; to adjust the existing ways to comply with any previously applicable instructions and requirements; to train personnel to be able to respond to a collection of information; to search data sources; to complete and review the collection of information; and to 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-2009-0529. 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) 566-1927. 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-2009-0529 and OMB Control Number 2060-0108 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 LARGE APPLIANCE SURFACE COATING (40 CFR part 60, subpart SS)									
	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)
	Records of Operating Parameter	0.25	250	62.5	72	4,500	225	450	\$438,302
SUBTOTAL RECORDKEEPING		Subtotal burden hours = 6,168							\$522,456
COMBINED ANNUAL BURDEN						6,660	333	666	\$648,687
GRAND TOTAL							7,659		

TABLE 2: AVERAGE ANNUAL EPA BURDEN: NEW SOURCE PERFORMANCE STANDARD (NSPS) FOR LARGE APPLIANCE SURFACE COATING (40 CFR part 60, subpart SS)								
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	72	288	14	29	\$13,711
Temperature Variance Reports	2	2	4	72	288	14	29	\$13,711
SUBTOTAL ANNUAL BURDEN					576	29	58	\$27,421
GRAND TOTAL						662		