

**SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY**

**NSPS FOR SURFACE COATING OF PLASTIC PARTS FOR BUSINESS MACHINES
(40 CFR PART 60, SUBPART TTT)**

1. Identification of the Information Collection

1(a) Title of the Information Collection

NSPS for Surface Coating of Plastic Parts for Business Machines (40 CFR Part 60, Subpart TTT)

1(b) Short Characterization/Abstract

The New Source Performance Standards (NSPS) for Surface Coating of Plastic Parts for Business Machines (40 CFR part 60, subpart TTT) were proposed on January 8, 1986, and were promulgated on January 29, 1988. These standards apply to the following facilities in industrial surface coating operations that apply coatings to plastic parts for use in the manufacture of business machines: each spray booth that applies prime coats, color coats, texture coats or touch-up coats. The standards apply to those facilities 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 TTT.

In general, all NSPS 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, in general, 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 10 sources are currently subject to the standard, and the number of sources subject to the regulation is expected to either remain the same or to slightly decrease during the next three years. These figures are based on estimates from the most recently approved Information Collection Request (ICR) renewal. The information collection will involve 10 respondents, 978 (rounded) burden hours, and \$92,296 (rounded) in labor costs.

OMB approved the currently active 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 111 of the Clean Air Act, 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 or operator subject to any requirement of this Act to:

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

In the Administrator's judgment, volatile organic compounds (VOC) emissions from the surface coating of plastic parts for business machines cause or contribute to air pollution that may reasonably be anticipated to endanger public health or welfare. Therefore, the NSPS were promulgated for this source category at 40 CFR part 60, subpart TTT.

2(b) Practical Utility/Users of the Data

The control of emissions of VOCs from the surface coating of plastic parts for business machines requires not only the installation of properly designed equipment, but also the operation and maintenance of that equipment. Emissions of VOCs from facilities subject to subpart TTT are the result of operation of the industrial surface coating operations that apply

coatings to plastic parts for use in the manufacture of business machines: each spray booth that applies prime coats, color coats, texture coats or touch-up coats. The notifications required in the applicable regulations 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 standards 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 performance test may also be observed. The standards restrict emissions to no more than 1.5 kilograms of VOCs per liter of coating solids applied for prime and color coats, and to no more than 2.3 kilograms of VOCs per liter of coating solids applied for texture and touch-up coats. The quarterly and semiannual reports are used for problem identification at the source, 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 NSPS continue to achieve compliance with the regulation. Adequate monitoring, recordkeeping, and reporting are necessary to ensure compliance with these standards, as required by the Clean Air Act. The information collected from recordkeeping and reporting requirements is also used for targeting inspections, and is of sufficient quality to be used as evidence in court.

3. Nonduplication, Consultations, and Other Collection Criteria

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

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

3(c) Consultations

For this information collection, the previous ICR renewal was used to obtain burden

estimates since this ICR renewal was processed under the “Expedited Approach” option. Per this guidance, all data and assumptions from the previous ICR renewal were used as the basis for estimating the hourly and cost burdens associated with this renewal.

The Agency has consulted industry experts and internal data sources to project the number of affected facilities and industry growth over the next three years. In a previous ICR renewal, EPA’s Office of Air Quality Planning and Standards (OAQPS) conducted an extensive review of and consultations with industry during development of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Surface Coating of Plastic Parts and Products. Approximately 10 respondents will be subject to the standard over the three year period covered by this ICR.

It is our policy to respond after a thorough review of comments received since the last ICR renewal as well as those submitted in response to the first Federal Register notice. In this case, no comments were received.

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 proper operation and maintenance of control equipment and the possibility of detecting violations would be less likely.

3(e) General Guidelines

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

3(f) Confidentiality

The required information has been determined not to be confidential. However, any information submitted to the Agency for which a claim of confidentiality is made will be safeguarded according to the Agency policies set forth in Title 40, Chapter 1, part 2, subpart B - Confidentiality of Business Information (see 40 CFR 2; 41 FR 36902, September 1, 1976; amended by 43 FR 40000, September 8, 1978; 43 FR 42251, September 20, 1978; 44 FR 17674, March 23, 1979).

3(g) Sensitive Questions

The reporting or recordkeeping requirements in the standard do not contain sensitive questions.

4. The Respondents and the Information Requested

4(a) Respondents/NAICS Codes

The respondents of the recordkeeping and reporting requirements are industrial coating operations that apply surface coatings to plastic parts for business machines that commenced construction, modification, or reconstruction after January 8, 1986. The SIC codes for the respondents affected by the standards are SIC (United States Standard Industrial Classification) 2851, 3079, 3471, 3573, 3574, 3579, 3661, and 3861 which correspond to the NAICS (The North American Industry Classification System) 32551, 332813, 339942, 334518, 333313, 33421, 334418, 333315, and 325992. The broad range of SIC codes covered by the standards reflects the fact that some business machine manufacturers are highly integrated and perform the actual spray coating of plastic parts on-site, while others purchase plastic parts that have already been coated at a specialized coating facility.

4(b) Information Requested

(i) Data Items

All data in this ICR that is recorded and/or reported is required by NSPS for Surface Coating of Plastic Parts for Business Machines (40 CFR part 60 subpart TTT).

A source must make the following reports:

A source must maintain the following records:

Recordkeeping for NSPS subpart TTT	
Startups, shutdowns, malfunctions, periods where the continuous monitoring system is inoperative	60.7(b)
Monthly performance test measures and calculations	60.724(a)
Records are required to be retained for two years. These records must be kept onsite.	60.724(d)

(ii) Respondent Activities

Perform initial performance test, Reference Method 24 test, and repeat performance tests if necessary.
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.

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 still not widely used. At this time, it is estimated that approximately 10 percent of the respondents

use electronic reporting.

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) database.

5(b) Collection Methodology and Management

Performance test reports are used by the Agency to discern a source's initial capability to comply with the emission standard, and to 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 and semiannual reports are used for problem identification, as a check on source operation and maintenance, and for compliance determinations.

Information contained in the reports is entered into the AFS which is operated and maintained by EPA's Office of Compliance. AFS is EPA's database for the collection, maintenance, and retrieval of compliance data for approximately 125,000 industrial and government-owned facilities. EPA uses 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 affected facilities are small entities (e.g., small businesses). The recordkeeping and reporting requirements were selected within the context of a small collection

of process equipment and reflect the burden on small businesses. The impact on small entities was accounted for in the regulation development. The requirements reflect the burden on small businesses. For the most part, smaller facilities will be using the same type of coating each month, and using the same spray application equipment. Consequently, the calculations for the monthly performance tests will be fairly repetitive and not as time-consuming as for larger sources which may use a much wider variety of coating types and application equipment of variable transfer efficiencies, etc. To the extent that larger businesses can use economies of scale to reduce their burden, the overall burden will be reduced. The Agency considers these requirements the minimum needed to ensure compliance and, therefore, cannot reduce them further for small entities.

The number of small entities potentially subject to the requirements of this information collection request is estimated to be 88 percent of the respondent universe, or 9 plants. This estimate is based on the percent of plants in this industry that were classified as small plants during the development of this rule.

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 Surface Coating of Plastic Parts for Business Machines (40 CFR part 60, subpart TTT).

6. Estimating the Burden and Cost of the Collection

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

6(a) Estimating Respondent Burden

The average annual burden to industry over the next three years from these recordkeeping and reporting requirements is estimated at 978 (rounded) person-hours (Total Labor Hours from Table 1). These hours are based on an Agency review of the industry during development of the NESHAP for Surface Coating of Plastic Parts and Products which are standards that apply to the same industry, Agency studies and background documents from the development of the regulation, Agency knowledge and experience with the NSPS program, and the previously approved ICR.

6(b) Estimating Respondent Costs

(i) Estimating Labor Costs

This ICR uses the following labor rates:

Managerial	\$115.40 (\$54.95 + 110%)
Technical	\$97.88 (\$46.61 + 110%)
Clerical	\$48.38 (\$23.04 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, June 2009, "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 and Operation and Maintenance Costs

The only type of industry costs associated with the information collection activity in the standards are labor costs. There are no capital/startup or operation and maintenance costs. There is no requirement for the installation of continuous monitoring equipment, or specialized testing devices. Monthly performance tests involve calculations only, and rely on data that is either readily available or routinely collected as part of normal operations. Most of the measurements and calculations required for monthly performance tests under this standard are consistent with the respondents' normal recordkeeping practices. Semiannual reports are essentially a statement that all performance tests showed the source to be in compliance with the emissions limitations. Quarterly reports are required only of those sources found to be in violation of the emission standards, and are required only during the particular quarter in which a performance test indicated a violation.

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

The only type of industry costs associated with the information collection activity in the regulations are labor costs. There are no capital/startup or operation and maintenance costs.

6(c) Estimating Agency Burden and Cost

The only costs to the Agency are those costs associated with analysis of the reported information. Publication and distribution of the information are part of the AFS program. Examination of records to be maintained by the respondents will occur as part of the periodic inspection of sources, which is part of EPA's overall compliance and enforcement program.

The average annual Agency cost during the three years of the ICR is estimated to be \$3,860 (Table 2: Annual Agency Burden and Cost - NSPS for the Surface Coating of Plastic Parts for Business Machines (40 CFR part 60, subpart TTT)).

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

Managerial	\$61.36 (GS-13, Step 5, \$38.35 + 60%)
Technical	\$45.52 (GS-12, Step 1, \$28.45 + 60%)

Clerical

\$24.64 (GS-6, Step 3, \$15.40 + 60%)

These rates are from the Office of Personnel Management (OPM), 2009 General Schedule, which excludes locality rates of pay. The rates have been increased by 60% to account for the benefit packages available to government employees. Details upon which this estimate is based appear in the attached Table 2: Annual Agency Burden and Cost - NSPS for the Surface Coating of Plastic Parts for Business Machines (40 CFR part 60, subpart TTT).

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

Approximately 10 sources are currently subject to the regulation, and the number of sources subject to the regulation is expected to either remain the same or to slightly decrease during the next three years.

Respondent Universe and Average Number of Responses Per Year						
Regulation Citation	(A) Average Number of New Respondents per Year	(B) Number of Reports for New Sources	(C) Number of Existing Respondents	(D) Number of Reports for Existing Sources	(F) Number of Respondents that keep records but do not submit reports	(E) Total Annual Responses (AxB)+(CxD)+F
NSPS, 40 CFR part 60, subpart TTT	0	4	10 2	2 (semiannual) 4 (quarterly)	0	28

The number of total respondents is 10. This number is the sum of column A and column C of the Respondent Universe and Number of Responses Per Year table. This represents the number of existing sources plus the number of new sources averaged over the three-year period (i.e., the total of the number of new respondents over the three-year period divided by three years).

The total annual response is 28. This number is in column E of the Respondent Universe and Number of Responses Per Year table above.

The total annual labor costs are \$92,296 (rounded). Details upon which this estimate is based appear in Table 1: Annual Respondent Burden and Cost - NSPS for the Surface Coating of Plastic Parts for Business Machines (40 CFR part 60, subpart TTT).

Note that the total annual capital and O&M costs to the regulated entity are \$0. These costs are detailed in Section 6(b)(iii), Capital/Startup vs. Operation and Maintenance (O&M) Costs.

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

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

(i) Respondent Tally

The total annual labor hours are 978, with annual labor costs of \$92,296. Details regarding these estimates may be found in Table 1. Annual Respondent Burden and Cost - NSPS for the Surface Coating of Plastic Parts for Business Machines (40 CFR part 60, subpart TTT) (attached). Furthermore, the annual public reporting and recordkeeping burden for this collection of information is estimated to average 35 hours per response.

There are no annual capital/startup and O&M costs.

(ii) The Agency Tally

The average annual Agency burden and cost over next three years is estimated to be 74 labor hours at a labor cost of \$3,285. The average annual travel expenses over the next three years cost \$575. Thus, the total average annual Agency burden is estimated to cost \$3,860. See Table 2. Annual Agency Burden and Cost - NSPS for the Surface Coating of Plastic Parts for Business Machines (40 CFR part 60, subpart TTT) (attached).

6(f) Reasons for Change in Burden

There is no change in the labor hours or cost 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 the respondents is very low, negative, or non-existent. Therefore, the labor hours and cost figures in the previous ICR reflect the current burden to the respondents and are reiterated in this ICR.

However, there is a decrease estimated burden currently identified in the OMB Inventory of Approved ICR Burdens. This decrease was due to a change in the adjustments to the estimates to correct a mathematical error.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 35 (rounded) 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 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-2009-0417. 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-2009-0417 and OMB Control Number 2060-0162 in any correspondence.

Part B of the Supporting Statement

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