

**SUPPORTING STATEMENT  
ENVIRONMENTAL PROTECTION AGENCY**

**NESHAP for Metal Can Manufacturing Surface Coating (40 CFR Part 63, Subpart KKKK) (Renewal)**

**1. Identification of the Information Collection**

**1(a) Title of the Information Collection**

NESHAP for Metal Can Manufacturing Surface Coating (40 CFR Part 63, Subpart KKKK) (Renewal), EPA ICR Number 2079.04, OMB Control Number 2060-0541

**1(b) Short Characterization/Abstract**

The National Emission Standards for Hazardous Air Pollutants (NESHAP) for Metal Can Manufacturing Surface Coating, published at 40 CFR part 63, subpart KKKK, were proposed on January 15, 2003, and promulgated on November 13, 2003. These regulations apply to facilities that perform surface coating operations on metal cans. Metal can manufacturing surface coating operations include any facilities that coat or print metal cans or metal can parts (e.g., metal ends for composite cans). The source category also includes the coating/printing of metal decorative tins, crowns, and closures, except for coil coating. Regulated activities include the coating/printing of metal sheets for subsequent processing into cans or can parts, but not the coating of metal coils for cans or can parts. This information is being collected to assure compliance with 40 CFR part 63, subpart KKKK.

In general, all NESHAP standards require initial notifications, performance tests, and periodic reports by the owners/operators of the affected facilities. They 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 affected facilities subject to NESHAP.

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 five 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.

Based on our consultations with industry representatives, there is an average of one affected facility at each plant site and that each plant site has only one respondent (i.e., the owner/operator of the plant site).

Over the next three years, an average of 71 respondents per year will be subject to the standard, and zero additional respondents per year will become subject to the standard.

The Office of Management and Budget (OMB) approve the currently active Information Collection Request (ICR) with the following "Terms of Clearance" (TOC):

The burden and cost assumptions and calculations for the respondents and the agency should be updated in the next renewal.

EPA has addressed each item of concern in the TOC by updating respondent assumptions using September 2009 labor rates from the United States Department of Labor, Bureau of Labor Statistics. Agency assumptions were updated using the Office of Personnel Management (OPM), 2010 General Schedule for Agency labor. Respondent and Agency cost assumptions are provided in Sections 6(b)(i) and 6(c) of this document.

The term, “Affected Public”, applies to private sector businesses or other for-profits that manufacture metal cans. The burden to the “Affected Public” may be found below in Table 1: Annual Respondent Burden and Cost: NESHAP for Metal Can Manufacturing Surface Coating (40 CFR Part 63, Subpart KKKK) (Renewal). The burden to the “Federal government” is attributed entirely to work performed by Federal employees or government contractors, and may be found below in Table 2: Annual Agency Burden and Cost: NESHAP for Metal Can Manufacturing Surface Coating (40 CFR Part 63, Subpart KKKK) (Renewal).

## **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 (HAP). 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.

In the Administrator's judgment, HAP emissions from metal can manufacturing operations cause or contribute to air pollution that may reasonably be anticipated to endanger public health or welfare. Therefore, NESHAP for this source category were promulgated at 40 CFR part 63, subpart KKKK.

### **2(b) Practical Utility/Users of the Data**

The recordkeeping and reporting requirements in the standards ensure compliance with

the applicable regulations which were promulgated in accordance with the Clean Air Act. The collected information is also used for targeting inspections and as evidence in legal proceedings.

Performance tests are required in order to determine an affected facility's initial capability to comply with the emission standards. Continuous emission monitors (CEMS) are used to ensure compliance with the standards at all times.

The notifications required in the standards are used to inform the Agency or delegated authority when a source becomes subject to the requirements of the regulations. The reviewing authority may then inspect the source to check if the pollution control devices are properly installed and operated and the standards are being met. The performance test may also be observed.

The required semiannual reports are used to determine periods of excess emissions, identify problems at the facility, verify operation/maintenance procedures and for compliance determinations.

The NESHAP also requires affected sources to submit a Notification of Compliance Status which includes the performance test results.

The NESHAP requires owners or operators to develop a startup, shutdown, and malfunction plan (SSMP), documenting procedures that will be taken in the case of any of these events. Other required submissions include startup, shutdown, and malfunction reports which demonstrate that the actions taken by an owner or operator during a startup, shutdown, or malfunction event comply with the SSMP. When actions taken are consistent with the plan, reports are required semiannually. When actions taken are inconsistent with the plan, immediate reports are required.

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

The requested recordkeeping and reporting are required under 40 CFR part 63, subpart KKKK.

#### **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 (74 FR 32581) on July 8, 2009. No comments were received on the burden published in the Federal Register.

### **3(c) Consultations**

During a previous renewal of this ICR, the Agency's industry experts have been consulted, and the Agency internal data sources and projections of industry growth over the next three years have been considered. The primary source of information as reported by industry, in compliance with the recordkeeping and reporting provisions in the standard, is the Air Facility System (AFS) 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. The growth rate for the industry is based on our consultations with the Agency's internal industry experts. Approximately 71 respondents will be subject to the standard over the three-year period covered by this ICR.

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.

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 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**

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

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

## 4. The Respondents and the Information Requested

### 4(a) Respondents/SIC and NAICS Codes

The respondents of the recordkeeping and reporting requirements are owners or operators of metal can manufacturing operations.

Standard	NAICS Codes
40 CFR part 63, subpart KKKK	332431 Metal Can Manufacturing
	332115 Crown and Closure Manufacturing
	332116 Metal Stamping
	332812 Metal Coating, Engraving (except Jewelry and Silverware), and Allied Services to Manufacturers
	332999 All Other Miscellaneous Fabricated Metal Product Manufacturing

### 4(b) Information Requested

#### (i) Data Items

All data in this ICR that are recorded and/or reported are required by 40 CFR part 63, subpart KKKK.

A source must make the following reports:

Notifications	
Initial notification	63.3510(b), 63.5(d), 63.9(b)
Notification of compliance status	63.3510(c), 63.9(h)
Notification of construction or reconstruction	63.3510(a), 63.5
Notification of actual startup	63.3510(a), 63.9(b)
Notification of performance test	63.3510(a), 63.7(b), 63.8(e), 63.9(e)

Notification Reports	
Semiannual report	63.3511(a)

<b>Notification Reports</b>	
Excess emissions report	63.3511(a)(4-8)
Report of performance test	63.3511(b)
Startup, shutdown, malfunction report	63.3511(c)

A source must keep the following records:

<b>Recordkeeping</b>	
Five year retention of records	63.3513(b), 63.10(b)
Material formulation data	63.3512(b)
Records of HAP content calculations	63.3512(c)
Copies of notifications and reports	63.3512(a)
Records of names of materials used	63.3512(d)
HAP fractions in each material used	63.3512(e)
Coating solids fraction in each material used	63.3512(f)
Density of materials used	63.3512(g)
Documentation of waste material shipped offsite	63.3512(h)
Documentation of deviations	63.3512(i)
Start-up, shutdown, and malfunction plan/records	63.3512(j), 63.6(e)
Records of continuous compliance with operating limits	63.3512(j)
Documentation of capture system efficiency determination	63.3512(j)
Documentation of add-on control device destruction or removal efficiency determination	63.3512(j)
Documentation of control device performance tests	63.3512(j), 63.10(b)
Determination of capture system and add-on control operating limits	63.3512(j)
Work practice plan/records	63.3512(j)

### 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.

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

### **ii. Respondent Activities**

<b>Respondent Activities</b>	
Read instructions.	
Install, calibrate, maintain, and operate CMS for temperature, for gas flow, or for pressure drop for oxidizer, carbon adsorber, condenser, concentrator, or capture system.	

<b>Respondent Activities</b>
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, 311, or ASTM Method D1475-98, D2697-86, D6093-97 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.

<b>Agency Activities</b>
Observe initial performance tests and repeat performance tests if necessary.
Review notifications and reports including: performance test reports; excess emissions reports; startup, shutdown, malfunction plan; and the CMS quality control plan.
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. 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 the AFS which is operated and

maintained by the EPA Office of Compliance. AFS is the EPA database for the collection, maintenance, and retrieval of compliance and annual emission inventory data for over 100,000 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 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 five years.

### **5(c) Small Entity Flexibility**

During rulemaking for subpart KKKK, EPA identified 13 small businesses subject to the rule. A majority of the respondents are large entities (i.e., large businesses). However, the impact on small entities (i.e., small businesses) was taken into consideration during the development of the regulation. Small entities were afforded extensive flexibility in demonstrating compliance through compliance options that give small entities flexibility in choosing the most cost effective and least burdensome alternative for their operation. 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 to be the minimum requirements 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: NESHAP for Metal Can Manufacturing Surface Coating (40 CFR Part 63, Subpart KKKK) (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 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.

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 27,517 (Total Labor Hours from Table 1). These hours are based on Agency studies and background documents from the development of the regulation, 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	\$114.49 (\$54.52 + 110%)
Technical	\$98.20 (\$46.76 + 110%)
Clerical	\$48.53 (\$23.11 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, September 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 percent to account for the benefit packages available to those employed by private industry.

### **(ii) Estimating Capital and Operating and Maintenance Costs**

This section covers the costs associated with all types of continuous monitoring equipment (e.g., CEMS and continuous parameter monitors). 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 monitors and other costs such as photocopying and postage.

### **(iii) Capital/Startup vs. Operating and Maintenance (O&M) Costs**

<b>Capital/Startup vs. Operating and Maintenance (O&amp;M) Costs</b>						
(A) Continuous Monitoring Device	(B) Capital/Startup Cost for One Respondent	(C) Number of New Respondents	(D) Total Capital/Startup Cost (B X C)	(E) Annual O&M Costs for One Respondent	(F) Number of Respondents with O&M	(G) Total O&M, (E X F)
CEM	\$16,000	0	\$0	\$1,200	71	\$85,200

The total Capital/Start-up costs for this ICR are zero. This is the total of column D in the above table.

The total Operating and Maintenance (O&M) costs for this ICR are \$85,200. This is the total of column G.

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 \$85,200. The continuous monitoring costs that are included in this section consist only of those capital/startup and O&M costs that a source incurs as a result of the standard. Some continuous monitoring costs may not be included in this section. For instance, if a particular industry typically utilizes a control

device that must have a continuous monitor (e.g., temperature, pressure drop, etc.) to function properly, and the recordation of additional measurements beyond the minimum are required by the standard, then there is no capital/startup or O&M cost, but there is a labor cost to record the additional readings. Such a cost would not appear in this section, but in the industry burden Section 6(d) below.

### 6(c) Estimating Agency Burden and Cost

The only costs to the Agency are those costs associated with analysis of the reported information. The EPA 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 \$125,208.

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

Managerial	\$62.27 (GS-13, Step 5, \$38.92 + 60%)
Technical	\$46.21 (GS-12, Step 1, \$28.88 + 60%)
Clerical	\$25.01 (GS-6, Step 3, \$15.63 + 60%)

These rates are from the Office of Personnel Management (OPM), 2010 General Schedule, which excludes locality rates of pay. The rates have been increased by 60 percent to account for the benefit packages available to government employees. Details upon which this estimate is based appear below in Table 2: Annual Respondent Burden and Cost: NESHAP for Metal Can Manufacturing Surface Coating (40 CFR part 63, subpart KKKK) (Renewal).

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

Based on our research for this ICR, there are approximately 71 existing sources currently subject to the standard. It is estimated that an additional zero sources per year will become subject to the regulation in the next three years.

Number of respondents is calculated using the following table which addresses the three years covered by this ICR.

Number of Respondents					
Year	(A) Number of New Respondents	(B) Number of Existing Respondents	(C) Number of 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	71	0	0	71
2	0	71	0	0	71
3	0	71	0	0	71
Average	0	71	0	0	71

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 71.

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

<b>Total Annual Responses</b>				
(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 compliance status	0	1	0	0
Notification of construction/reconstruction	0	1	0	0
Notification of actual startup	0	1	0	0
Notification of performance test	0	1.2	0	0
Report of performance test	0	1.2	0	0
Semiannual report	71	2	0	142
Excess emissions report	71	2	0	142
Startup, shutdown, malfunction report	18	1	0	18
			Total	302

The number of Total Annual Responses is 302.

The total annual labor costs are \$2,602,773. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost: NESHAP for Metal Can Manufacturing Surface Coating (40 CFR Part 63, Subpart KKKK) (Renewal).

Note that the total annual capital and O&M costs to the regulated entity are \$85,200. These costs are detailed in Section 6(b)(iii), Capital/Startup vs. Operation and Maintenance (O&M) Costs.

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

The detailed bottom line burden hours and cost calculations for the respondents and the Agency are shown in Tables 1 and 2, respectively, and summarized below.

#### **(i) Respondent Tally**

The total annual labor hours are 27,517. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost: NESHAP for Metal Can Manufacturing Surface Coating (40 CFR Part 63, Subpart KKKK) (Renewal). Furthermore, the annual public reporting and recordkeeping burden for this collection of information is estimated to average 91 hours per response.

The total annual capital/startup and O&M costs to the regulated entity are \$85,200. 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 2,778 labor hours at a cost of \$125,208. See below Table 2: Annual Agency Burden and Cost: NESHAP for Metal Can Manufacturing Surface Coating (40 CFR Part 63, Subpart KKKK) (Renewal).

### **6(f) Reasons for Change in Burden**

There is no change in the labor hours 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 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 an increase in both respondent and Agency costs due to labor rate increases from 2003 to the most recent available rates. This ICR uses updated labor rates to address “Terms of Clearance” associated with the previous ICR renewal.

### **6(g) Burden Statement**

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 91 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–2009–0403. 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, N.W., 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, N.W., Washington, D.C. 20503, Attention: Desk Officer for EPA. Please include the EPA Docket ID Number EPA-HQ-OECA-2009-0403 and OMB Control Number 2060-0541 in any correspondence.

### **Part B of the Supporting Statement**

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

<b>Table 1. Annual Respondent Burden and Cost: NESHAP for Metal Can Manufacturing Surface Coating (40 CFR Part 63, Subpart KKKK) (Renewal)</b>								
Burden Item	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)
	Person hours per occurrence	Number of occurrences per year	Person hrs. per respondent per year (C=A*B)	Respondents per year	Technical person hrs. per year (E=C*D)	Management person hrs. per year (F=E*0.05)	Clerical person hrs. per year (G=E*0.1)	Annual costs (\$)
<b>1. Reporting requirements</b>								
a. Read rule and instructions	4	1	4	71	284	14.2	28.4	30,893
b. Compile and process data	4	4	16	71	1,136	56.8	113.6	123,571
<b>c. Write reports</b>								
i. Initial notification	2	1	2	0	0	0	0	0
ii. Notification of compliance status	2	1	2	0	0	0	0	0
iii. Notification of construction/reconstruction	2	1	2	0	0	0	0	0
iv. Notification of actual startup	2	1	2	0	0	0	0	0
v. Notification of performance test	2	1.2	2.4	0	0	0	0	0
vi. Report of performance test <sup>1</sup>	10	1.2	12	0	0	0	0	0
vii. Semiannual report	6	2	12	71	852	42.6	85.2	92,678
viii. Excess emissions report	2	2	4	71	284	14.2	28.4	30,893
ix. Startup, shutdown, malfunction report <sup>2</sup>	2	1	2	18	36	1.8	3.6	3,916
Subtotal Reporting Labor and Cost Burden					2,981		281,951	
<b>2. Recordkeeping requirements</b>								
a. Read rule and instructions	4	1	4	71	284	14.2	28.4	30,893
b. Plan activities	12	1	12	71	852	42.6	85.2	92,678
c. Implement activities	12	1	12	71	852	42.6	85.2	92,678

<b>Table 1. Annual Respondent Burden and Cost: NESHAP for Metal Can Manufacturing Surface Coating (40 CFR Part 63, Subpart KKKK) (Renewal)</b>									
Burden Item	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)	
	Person hours per occurrence	Number of occurrences per year	Person hrs. per respondent per year (C=A*B)	Respondents per year	Technical person hrs. per year (E=C*D)	Management person hrs. per year (F=E*0.05)	Clerical person hrs. per year (G=E*0.1)	Annual costs (\$)	
d. Maintain record system for material used	20	1	20	71	1,420	71	142	154,464	
e. Time to enter information									
i. Material usage	0.5	365	182.5	71	12,958	648	1,296	1,409,484	
ii. Compliance calculation	2	12	24	71	1,704	85.2	170	185,357	
f. Time to train personnel	10	1	10	71	710	35.5	71	77,232	
g. Store, file, and maintain records	2	12	24	71	1,704	85.2	170	185,357	
h. Retrieve records/reports	1	12	12	71	852	42.6	85.2	92,678	
Subtotal Recordkeeping Labor and Cost Burden						24,536		2,320,822	
Total Burden (Hrs) and Costs						23,928	1,196	2,393	
						Totals	27,517	\$2,602,773	

**Assumptions:**

<sup>1</sup> 20 percent retest

<sup>2</sup> Estimated 25 percent of facilities use add-on controls, submit startup, shutdown, malfunction report once per year.

**Table 2. Annual Agency Burden and Cost: NESHAP for Metal Can Manufacturing Surface Coating (40 CFR Part 63, Subpart KKKK) (Renewal)**

Burden Item	(A) Person hours per occurrence	(B) Number of occurrences per year	(C) Number of respondents	(D) Technical person hours per year (D=A*B*C)	(E) Management person hours per year (E=D*0.05)	(F) Clerical person hours per year (F=E*0.1)	(G) Annual costs (\$)
1. Initial performance test	24	1	0	0	0	0	0
2. Repeat performance test	24	0.2	0	0	0	0	0
3. Report review							
a) Initial notification	8	1	0	0	0	0	0
b) Notification of performance test	8	1.2	0	0	0	0	0
c) Notification of compliance status	8	1	0	0	0	0	0
d) Notification of construction/reconstruction	8	1	0	0	0	0	0
e) Notification of actual startup	8	1	0	0	0	0	0
f) Report of performance test	8	1.2	0	0	0	0	0
g) Semiannual report	12	2	71	1,704	85.2	170.4	\$88,309
h) Excess emissions report	4	2	71	568	28.4	56.8	\$29,436
i) Startup, shutdown, report	8	1	18	144	7.2	14.4	\$7,463
Total Burden (Hrs) and Costs				2,416	121	242	
				Totals	2,778		\$125,208