

PART A OF THE SUPPORTING STATEMENT

1. Identification of the Information Collection

(a) *Title and Number of Information Collection.*

"National Volatile Organic Compound Emission Standards for Architectural Coatings." The Environmental Protection Agency (EPA) tracking number for this information collection request (ICR) is 1750.06. This is a renewal of a continuing ICR, OMB No. 2060-0393, which is due to expire December 31, 2011.

(b) *Short Characterization.*

(i) *Type of collection.*

1 Compliance with the architectural coatings rule was required by September 1999. The regulation requires that manufacturers and importers of architectural coatings adhere to volatile organic compound (VOC) content limits in the regulation. Information collection requirements for manufacturers and importers complying with the VOC content limits consist of product labeling; an initial notification report, which includes an explanation of any date code used; and subsequent explanations of any date codes revised after submittal of the initial report. The regulation does not contain any additional reporting or recordkeeping requirements unless a manufacturer or importer chooses to comply through one of the optional provisions in lieu of meeting the VOC content limits (i.e., the tonnage exemption, exceedance fee, or recycled coating credit provisions).

The rule contains an optional tonnage exemption that allows each manufacturer and importer to exempt a specified total mass of VOC in architectural coatings. The tonnage exemption would be used for products that do not comply with the VOC content limits and for which no exceedance fee is paid. Additional information collection requirements for the tonnage exemption include records of VOC calculations and volumes of coating manufactured or imported and an annual report.

The rule includes an exceedance fee alternative compliance option to provide additional compliance flexibility. This is an economic incentive approach whereby manufacturers and importers may choose to comply with the VOC requirements in the rule by paying a fee in lieu of meeting the VOC content limits. The per product exceedance fee is calculated based on both

the volume of product manufactured or imported and the amount of VOC above the VOC content limit for that product. Additional information collection requirements for the exceedance fee option include records of fee calculations and inputs and an annual report.

Manufacturers and importers of recycled coatings have the option to take credit for the post-consumer coating content when determining the VOC content of the coating, which results in a less stringent control requirement. Additional information collection requirements for the recycled coating option include records of VOC calculations, additional labeling, and an annual report.

All records required under the rule must be retained for 3 years.

The rule requires that the labels or lids of all subject architectural coatings display the date of manufacture, the manufacturer's recommended thinning, and the VOC content of the coating. Many manufacturers already include this information on their coating labels as a part of normal and usual practice. For additional flexibility, the date of manufacture can be expressed as a code and can be located either on the label, lid, or bottom of the container. The rule also requires that the labels or lids of all subject industrial maintenance coatings display a statement indicating that industrial maintenance coatings are primarily intended for industrial and professional use. In addition, each manufacturer and importer using the adjusted VOC content for a recycled coating is required to include a statement indicating the post-consumer coating content on the coating container label or lid.

(c) *Terms of OMB Clearance.*

The Office of Management and Budget (OMB) approved the previous ICR 1750.05 on December 2, 2008, with the following terms of clearance: *"This Collection of Information is approved. Before resubmission of this request, the Agency should update its estimates of the number of businesses subject to the requirements of the Architectural Coatings Rule. In addition, the agency should update its estimates of the burden for each business subject to these information collection requirements."*

2. Need for and Use of the Collection

(a) *Need/Authority for the Collection.*

1 Section 183(e) of the Clean Air Act (CAA) requires EPA to regulate categories of consumer and commercial products that account for at least 80

percent of the VOC emissions, on a reactivity-adjusted basis, in areas that violate the National Ambient Air Quality Standards for ozone. The EPA determined that the architectural coating category is one of the largest VOC emission sources among the consumer and commercial products categories, in many States represents a significant source of unregulated VOC emissions, and that VOC emissions from the use of architectural coatings contribute to ground-level ozone formation in ozone nonattainment areas. Therefore, EPA published standards regulating VOC emissions from architectural coatings under section 183(e) of the CAA on September 11, 1998 (40 CFR part 59, subpart D).

The reporting, labeling, and recordkeeping activities required under the architectural coatings rule enable EPA to determine whether or not coatings manufactured or imported for sale or distribution in the United States are in compliance with the requirements in the rule. Reports and records are used to determine whether exceedance fees (if applicable) are paid for coatings for which the manufacturer or importer has chosen the exceedance fee option. For the tonnage exemption, the reports and records are used to ensure that the allowed exemption levels are not exceeded. Reports, records, and product labels associated with the recycled coatings provision are used to ensure that the adjusted VOC content is calculated properly.

(b) Practical Utility/Users of the Data

The data collected under this ICR are essential to ensure compliance with the rule and to evaluate its effectiveness. Specifically, Agency enforcement personnel use the information collected to: (1) identify manufacturers and importers subject to the rule; (2) ensure that architectural coatings comply with VOC content standards, including accounting for recycled coating content; (3) verify that exceedance fees are calculated properly and paid in the correct amounts; (4) determine the volume of coating manufactured or imported for which fees are paid; (5) determine the total revenues paid in exceedance fees; and (6) verify that the VOC content of the coatings is calculated properly for the tonnage exemption and that the exemption levels are not exceeded. The reported information assists EPA in deciding which architectural coating manufacturers or importers should be inspected. The requirement for date of manufacture (or date code) to be placed on coating containers is useful to EPA for comparison to manufacturers' records and reports to determine compliance with VOC content limits, and with the exceedance fee and tonnage exemption requirements.

3. Nonduplication, Consultations, and Other Collection Criteria

(a) Nonduplication.

1 The information collected pursuant to the regulation consists primarily of the VOC content information for architectural coating products, the calculation of exceedance fees due, the calculation of total VOC emissions from particular products claimed under the tonnage exemption, and the calculation of the post-consumer coating content of recycled coatings. This information is not collected by any other Federal agency.

(b) Public Notice Required Prior to ICR Submission to OMB

On June 27, 2011 EPA published a notice in the Federal Register (76 FR 37347) entitled, *Agency Information Collection Activities: Proposed Collection; Comment Request; National Volatile Organic Compound Emission Standards for Architectural Coatings*. The purpose of the notice was to announce that EPA was planning to submit this continuing ICR to OMB for review and approval, and to solicit comments on the proposed continued collection. EPA received no comments during the comment period.

(c) Consultations

Significant input and information was received from the affected industry, State and local governments, and environmental groups during development of the rule. In addition, in preparing to submit this ICR to OMB for renewal, EPA contacted parties within the affected industry to obtain information on the universe of affected sources and feedback on accuracy of the burden estimates.

TABLE 1

CONSULTATIONS

David Darling	National Paint and Coatings
Association	
Madelyn Harding	Sherwin Williams
David Mazzocco	PPG

(d) Effects of Less Frequent Collection.

1 This ICR includes a one-time initial notification report for all manufacturers and importers. For those reporting VOC content adjusted for

post-consumer coating content, an annual report is required. For those using the tonnage exemption option, an annual report is required. For those using the exceedance fee option, an annual report is required. Less frequent reporting would not allow for effective or timely compliance determination. The EPA believes annual reporting is frequent enough to provide the information needed for compliance tracking without being too burdensome on the industry or the Agency.

(e) General Guidelines.

This ICR adheres to the guidelines for Federal data requesters, as provided at 5 CFR 1320.6. The regulation requires that records be maintained for 3 years. This period of record retention is consistent with other ongoing similar programs and allows enough record history for inspectors to adequately monitor compliance.

(f) Confidentiality.

(i) Confidentiality.

All 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 36092, September 1, 1976; amended by 43 FR 39999, September 8, 1978; 43 FR 42251, September 28, 1978; 44 FR 17674, March 23, 1979).

(ii) Sensitive Questions.

This section is not applicable because this ICR does not involve matters of a sensitive nature.

4. The Respondents and the Information Requested

(a) Respondents/SIC and NAICS Codes.

1 Respondents to this information collection are manufacturers and importers of architectural coatings. Manufacturers of architectural coatings fall within North American Industry Classification System (NAICS) 325510, "Paint and Coating Manufacturers," and Standard Industrial Classification (SIC) 2851, "Paints, Varnishes, Lacquers, Enamels, and Allied Products." Importers of architectural coatings fall within NAICS 424950

"Paint, Varnish and Supplies Merchant Wholesalers," and SIC 5198, "Wholesale Trade: Paints, Varnishes, and Supplies."

(b) Information Requested.

1(i) Data items, including recordkeeping requirements.

Attachment 1, Source Data and Information Requirements, summarizes the labeling, recordkeeping, and reporting requirements. All records required under the rule must be retained for 3 years.

(ii) Respondent activities.

Table 2 presents the labeling, recordkeeping and reporting activities, and burdens for the rule. The respondent activities required by the standards are listed in the first column of Table 2.

Several States regulate architectural coatings and require certain labeling, recordkeeping, and reporting activities. The regulation includes similar requirements to the extent practical in order to minimize the cumulative burden to the industry.¹

**TABLE 2. AVERAGE ANNUAL INDUSTRY BURDEN AND COST OF REPORTING AND RECORDKEEPING
OVER THE 3-YEAR PERIOD BEGINNING JANUARY 1, 2012, FOR MANUFACTURERS COMPLYING
WITH THE STANDARDS FOR ARCHITECTURAL COATINGS**

Burden Item	(A) Person Hours Per Occurrence (hrs/manufacturer)	(B) Number of Occurrences Per Respondent Per Year	(C) Person Hours Per Respondent Per Year (a) (C=AxB)	Dollars Per Hour	(D) Respondents per Year	(E) Total Hours Per Year (E=CxD)	(F) Total Cost Per Yearb
1. Applications	Not applicable						
2. Surveys and Studies	Not applicable						
3. Reporting Requirements	Not applicable						
A. Read Instructions	2	1	2	\$86	5c	10	\$860
B. Gathering Existing Information	Included in 3.C						
C. Write Report	Not applicable						
Initial Report	2	1	2	\$86	5c	10	\$860
Date Code Explanation	1	1	1	\$86	5c	5	\$430
Update Date Codes	2	1	2	\$86	50d	100	\$8,600
Recycled Coatings Report - Mass Balance	6	1	6	\$86	12.5e	75	\$6,450
Recycled Coatings Report - Formulation	4	1	4	\$86	12.5e	50	\$4,300
Exceedance Fee Annual Report	8	1	8	\$86	45f	360	\$30,960
Tonnage Exemption Annual Report	8	1	8	\$86	75g	600	\$51,600

Burden Item		(A) Person Hours Per Occurrence (hrs/manufacturer)	(B) Number of Occurrences Per Respondent Per Year	(C) Person Hours Per Respondent Per Year (a) (C=AxB)	Dollars Per Houra	(D) Respondents per Year	(E) Total Hours Per Year (E=CxD)	(F) Total Cost Per Yearb
4.	Recordkeeping Requirements							
A.	Read Instructions	Included in 3.A						
B.	Plan Activities	8	1	8	\$103 ^a	5c	40	\$4,120
C.	Implement Activities							
	Calculate VOC content for Each Product	42h	1	42	\$86	5c	210	\$18,060
	Calculate Adjusted VOC for Recycled Coatings	20	1	20	\$86	25i	500	\$43,000
	Exceedance Fee - Calculations	64	1	64	\$86	45f	2,880	\$247,680
	Tonnage Exemption Calculations	16	1	16	\$86	75g	1,200	\$103,200
D.	Record Data							
	Recycling Volumes	8	12	96	\$86	25i	2,400	\$206,400
	Exceedance Fee	8	1	8	\$86	45f	360	\$30,960
	Tonnage Exemption	4	1	4	\$86	75g	300	\$25,800
E.	Time to Train Personnel	Not applicable						
5.	Labeling	67j	1	67	\$86	83k	5,561	\$478,246
Total							14,661	\$1,261,526

Key for Table 2

- a All tasks are assumed to be performed by a technical person (\$86/hr) unless otherwise noted. Activities planning is assumed to be performed by a manager (\$103/hr).
- b Costs were calculated by multiplying the total number of hours by the hourly wages.
- c Total number of manufacturers is estimated to be 500; 1 percent or 5 new respondents per year are assumed.
- d Assumed that 10 percent of manufacturers update some date codes each year. $(500 \text{ manufacturers})(0.10) = 50 \text{ manufacturers}$.
- e Assumed that 5 percent of manufacturers recycle coatings $(500 \text{ manufacturers})(0.05) = 25 \text{ manufacturers}$. Of the 25 manufacturers, assumed half of the recycle coating manufacturers would demonstrate compliance using mass balance and the other half using formulations.
- f Based on exceedance fee reports received in 2009 (52) and 2010 (39), it is estimated that 45 exceedance fee reports will be submitted per year.
- g Assumed that 75 manufacturers will use the tonnage exemption option.
- h Based on a time estimate of 1 hour per coating product. $(1 \text{ hour/product})(42 \text{ products/manufacture}) = 42 \text{ hours/manufacture}$.
- i Assumed that 5 percent of manufacturers recycle coatings. $(500 \text{ manufacturers})(0.05) = 25 \text{ manufacturers}$.
- j Based on an industry estimate of 320 hours needed to modify labels for a company with 200 paint products, or 1.6 hours per product. $(1.6 \text{ hours/product})(42 \text{ products/manufacture}) = 67 \text{ hours/manufacture}$.
- k Assumed that half of the manufacturers would have to modify their labels over 3 years. $(500 \text{ manufacturers})(0.5)/(3 \text{ years}) = 83 \text{ manufacturers per year}$.

5. The Information Collected--Agency Activities, Collection Methodology, and Information Management.

(a) Agency Activities.

A list of activities required of the EPA is provided in Table 3.

(b) Collection Methodology and Management

The information collected under this rule will be maintained in a computerized database. As noted in section 2(b) of this ICR, the information collected is a necessary part of compliance determination.

(c) Small Entity Flexibility.

Although the rule does not contain any specific small entity provisions, the rule contains two provisions that may reduce the burden of this rule on small entities. These provisions are the exceedance fee provision and the tonnage exemption.

(d) Collection Schedule.

1 The rule requires all manufacturers and importers of subject coatings to submit an initial notification report no later than September 13, 1999 (March 13, 2000 for products registered under the Federal Insecticide, Fungicide, and Rodenticide Act, or within 180 days after becoming subject to the rule, whichever is later. All manufacturers and importers of subject coatings must submit an explanation of any new date code no later than 30 days after the new date code is first used.

Manufacturers and importers choosing the recycled coating provision must submit an annual report by March 1 following the year in which the recycled coating provision is used. Manufacturers and importers choosing the exceedance fee provision must submit an annual report by March 1 following the calendar year in which the coatings for which the fee provision is used are manufactured or imported. Manufacturers and importers choosing the tonnage exemption must submit an annual report by March 1 of the year following the calendar year in which the exemption was claimed.

TABLE 3. AGENCY BURDEN FOR THE ARCHITECTURAL COATINGS RULE

Reports	A EPA Technical Hours Per Occurrence	B Occurrences Per Year	C Person Hours Per Year (Technical) C = A x B	D Person Hours Per Year (Management) D = C x 0.05	E Person Hours Per Year (Clerical) E = C x 0.1	F Total Cost Per Year
Initial Report ^b	1.0	5	5	0.3	0.5	\$481
Annual Report: Manufacture of Recycled Coatings - Mass Balance ^c	1.0	12.5	12.5	0.6	1.3	\$1,203
Annual Report: Manufacture of Recycled Coatings - Formulation ^c	0.5	12.5	6.3	0.3	0.6	\$602
Date Code Reports ^b	0.5	5	2.5	0.1	0.3	\$241
Date Code Updates ^d	0.5	50	25	1.3	2.5	\$2,406
Annual Report: Exceedance Fee ^e	4.0	45	180	9	18	\$17,325
Annual Report: Tonnage Exemption ^f	2.0	75	150	7.5	15	\$14,438
Maintenance of implementation database	60	1	60	3	6	\$5,775
Totals			441	22	44	\$42,470

a Total cost per year = (column C)(\$86/hr) + (column D)(\$103/hr) + (column E)(\$51/hr).

b Total number of manufacturers is estimated to be 500; 1 percent or 5 new respondents per year are assumed.

c Assumed 25 recycled coating manufacturers; assumed half use mass balance option and half use formulation option.

d Assumed 10 percent of all manufacturers update some date codes each year. (500 manufacturers)(0.10) = 50 manufacturers.

e Assumed 45 manufacturers will pay fees on some coatings (see footnote f in Table 2).

f Assumed 75 manufacturers will use tonnage exemption option.

6. Estimating the Burden and Cost of the Collection

(a) Estimating Respondent Burden.

The average annual burden estimates for reporting, recordkeeping, and labeling requirements are presented in Table 2 for all manufacturers. These numbers were derived from estimates based on EPA's experience with other standards and from information obtained from the industry representatives listed in Table 1. Because this is a renewal of an existing ICR, these estimates represent the average annual burden that will be incurred by the affected industry in the 3-year period beginning January 1, 2012. The hours shown in column A of Table 2 are the burden estimate per manufacturer.

(b) Estimating Respondent Costs.

Table 2 also presents estimated costs for the required recordkeeping and reporting activities. Industry labor rates are based on an average of occupational wage rates for the affected NAICS groupings 3256 and 3259 (from the United States Department of Labor, Bureau of Labor Statistics, 2006, http://data.bls.gov/oes/search.jsp?data_tool=OES). Management wages were based on industrial production managers, technical wages were based on health and safety engineers, and clerical rates were based on production, planning, and expediting clerks. The resultant average wage rates were: management (\$45.82); technical (\$38.13); and clerical (\$22.85). To estimate the actual labor costs to be used in Table 3, an overhead of 125 percent was added to the raw labor rates resulting in the following loaded labor rates: management (\$103); technical (\$86); and clerical (\$51). There are no capital or O&M costs associated with the ICR.

(c) Estimating Agency Burden and Cost.

Because the information collection requirements were estimated as an incidental part of the standard development, no costs can be attributed to the development of the information collection requirements. Because reporting and recordkeeping requirements on the part of respondents are required under section 183(e) of the Act, no operational costs will be incurred by the Federal government. Examination of records to be maintained by the respondents will occur incidentally as a part of the periodic inspection of sources that is part of the EPA's overall compliance and enforcement program and is not attributable to this ICR. The only costs that the Federal government will incur are costs associated with the review of reported information, as presented in Table 3.

¹ Labor rates and associated costs are based on the hourly rates estimated above in paragraph 6.(b) as follows: \$51 for clerical personnel, \$86 for technical personnel, and \$103 for management personnel. The number of management hours is assumed to equal 5 percent of the number of technical hours; the number of clerical hours is assumed to equal 10 percent of the number of technical hours (see Table 3).

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

1 The respondent universe consists of 500 architectural coating manufacturers. Of these, 75 are considered large manufacturers and 425 are considered small manufacturers. Due to importers' small market presence (less than 1 percent of total coating sales volume in 1990) and the lack of detailed product data on imported coatings, importers have not been included in this burden estimate.

The annual respondent burden will vary depending on the actual compliance choices that are made by the manufacturer or importer. Specifically, the burden will vary depending on whether the recycled coating, exceedance fee, or tonnage exemption provisions are chosen.

In order to estimate the industry burden, assumptions were made about the number of manufacturers that would choose each of the optional provisions (see appropriate footnotes in Table 2). Other assumptions were that the number of new respondents submitting the one-time Initial Notification Report and date code explanations will be 1 percent of the total respondent universe of 500, or about 5 per year.

(e) Bottom Line Burden Hours and Cost Tables.

(i) Respondent Tally

1The bottom line industry burden hours and costs, presented in Table 2, are calculated by summing the total hours per year column (column E) and by summing the total cost per year column (column F). The annual burden and cost to the industry averaged over the 3-year period beginning January 1, 2012, is 14,661 hours and \$1,261,526. This is a reduction of 1,980 hours and increase of \$37,019 from the burden calculation for the ICR approved in 2008. The hour reduction is due to the smaller estimated number of exceedance fee reports and tonnage exemption reports. These estimates were updated based on actual reports submitted in 2009 and 2010. This is further discussed below in paragraph 6.(f), "Reasons for Change in Burden." The cost increase is due to an increase in labor rates.

The average annual base reporting, recordkeeping, and labeling burden per manufacturer for this ICR is 29 hours (14,661 hours/500 manufacturers = 29 hours per manufacturer). The actual burden for each manufacturer will vary depending on the compliance choices that they make. Manufacturers that meet all of the mandatory requirements and do not select any of the optional requirements will have an annual reporting, recordkeeping, and labeling burden of approximately 12 hours (5,936 hours/500 manufacturers = 12 hours per manufacturer).

Manufacturers that choose the recycled coating provision will have an annual reporting, recordkeeping, and labeling burden of approximately 133 hours (3,025 hours/25 manufacturers = 121 hours per manufacturer; 12 hours + 121 hours = 133 hours per manufacturer). Manufacturers that choose the exceedance fee provision will have an annual reporting, recordkeeping, and labeling burden of approximately 100 hours (5,280 hours/60 manufacturers = 88 hours per manufacturer; 88 hours + 12 hours = 100 hours per manufacturer). Manufacturers that choose the tonnage exemption will have an annual reporting, recordkeeping, and labeling burden of approximately 44 hours (2,400 hours/75 manufacturers = 32 hours per manufacturer; 32 hours + 12 hours = 44 hours per manufacturer).

The total per manufacturer reporting, recordkeeping, and labeling burden is the lowest for manufacturers that meet the VOC content limits, and would be higher for those that choose the optional tonnage exemption, exceedance fee provision, or recycled coating provision.

(ii) Agency Tally

The bottom line Agency burden and cost, presented in Table 3 is calculated in the same manner as the industry burden and cost. The estimated annual burden and cost averaged over the 3-year period beginning January 1, 2012, are 441 hours and \$42,470.

(iii) Variations in the annual bottom line.

No significant variations in the annual respondent burden or cost are expected over the 3-year period beginning on January 1, 2012.

(f) Reasons for Change in Burden.

This renewal of a continuing ICR includes the following one-time burden and cost items: reading instructions, the initial report, explanation of date codes, planning activities, and calculating VOC content. To develop the estimates of annual average burden, these one-time activities were averaged over 3 years, beginning after the rule has been effective for more than 5 years. Therefore, EPA assumes that the vast majority of one-time initial reports already will have been submitted by August 2011 and only new notifications will be submitted during the period covered by this ICR renewal. The assumptions used as a basis for the burden calculations more fully explain this concept (see footnotes in Table 2).

We have reduced the estimated number of exceedance fee reports from 50 to 45 per year, based on actual exceedance fee reports submitted in calendar year 2009 and 2010. The number of tonnage exemption reports should be more than the number of exceedance fee reports because the

tonnage exemption allows some coatings to exceed their VOC content limit without incurring an exceedance fee.

(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 29 hours per respondent. The total reporting and recordkeeping burden for an individual respondent will vary depending on the compliance option(s) chosen. Respondents meeting the VOC content limits will have the lowest reporting and recordkeeping burden. Manufacturers and importers that choose the option of calculating an adjusted VOC content for recycled coatings, paying an exceedance fee, or exercising the tonnage exemption will have a higher reporting and recordkeeping burden. The final rule requires an initial one-time notification from each respondent. Respondents whose coating products have a VOC content that is less than or equal to the VOC content limits have no periodic requirements. Respondents using the recycled coatings provision must keep records and submit annual reports. Respondents taking advantage of the tonnage exemption must file an annual report and must maintain records for the coatings being claimed under the exemption. Respondents paying an exceedance fee must keep records for each coating product on which fees are paid and submit an annual report.

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 docket for this ICR under Docket ID No. EPA-HQ-OAR-2011-0371, which is available for online viewing at www.regulations.gov, or in person viewing at the Air and Radiation docket in the EPA Docket Center (EPA/DC), EPA West, Room 3334, 1301 Constitution Avenue, NW, Washington, D.C. The EPA/DC 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 Air and Radiation Docket Center is 202-566-1742. An electronic version of the public docket is available at www.regulations.gov. This site can be used to submit or view public comments, access the index listing of the contents of the public 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 above. 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 Office for EPA. Please include the EPA Docket ID Number EPA-HQ-OAR-2011-0371 and OMB Control Number 2060-0393 in any correspondence.

1Attachment 1
Source Data and Information Requirements

Requirement	Regulation Reference
LABELING	
<input type="checkbox"/> Date of Manufacture	59.405(a)(1)
<input type="checkbox"/> Recommendation for thinning	59.405(a)(2)
<input type="checkbox"/> VOC content	59.405(a)(3)
In addition, for each industrial maintenance coating:	
<input type="checkbox"/> One of the following statements of use For industrial use only. For professional use only. Not for residential use. or Not intended for residential use. or, This coating is intended for use under the following condition(s): (Include each condition that applies to the coating.) Immersion in water, wastewater, or chemical solutions (aqueous and nonaqueous solutions), or chronic exposure of interior surfaces to moisture condensation; Acute or chronic exposure to corrosive, caustic, or acidic agents, or to chemicals, chemical fumes, or chemical mixtures or solutions; Repeated exposure to temperatures above 120 degrees Celsius (250 degrees Fahrenheit); Repeated (frequent) heavy abrasion, including mechanical wear and repeated (frequent) scrubbing with industrial solvents, cleansers, or scouring agents; or,	59.405(b)
Exterior exposure of metal structures and structural components	
In addition, for each coating using the optional recycled coating credit:	
<input type="checkbox"/> The statement "Contains not less than X percent by volume post-consumer coating." Where "X" is replaced with the percent, by volume, of post-consumer coating	59.405(c)
RECORDKEEPING	

Requirement	Regulation Reference
For each coating for which the optional recycled coating credit is applied:	
<input type="checkbox"/> Minimum volume percent post-consumer coating content	59.407(a)(1)
<input type="checkbox"/> Volume of post-consumer coating received for recycling	59.407(a)(2)
<input type="checkbox"/> Volume of post-consumer coating received that was unusable	59.407(a)(3)
<input type="checkbox"/> Volume of virgin materials	59.407(a)(4)
<input type="checkbox"/> Volume of final recycled coating	59.407(a)(5)
<input type="checkbox"/> Calculation of adjusted VOC content	59.407(a)(6)
For each manufacturer and importer using the optional exceedance fee provision:	
<input type="checkbox"/> A list of the coatings and the associated coating categories in Table 1 of the regulation for which the exceedance fee is used	59.407(b)(1)
<input type="checkbox"/> Calculation of the annual fee for each coating and the total annual fee for all coatings	59.407(b)(2)
<input type="checkbox"/> The VOC content of each coating	59.407(b)(3)
<input type="checkbox"/> The excess VOC content of each coating	59.407(b)(4)
<input type="checkbox"/> The total volume manufactured or imported per period for each coating	59.407(b)(5)
<input type="checkbox"/> The annual fee for each coating	59.407(b)(6)
<input type="checkbox"/> The total annual fee for all coatings	59.407(b)(7)
For each manufacturer or importer using the optional tonnage exemption:	
<input type="checkbox"/> A list of all coatings and the associated coating categories in Table 1 of the regulation for which the tonnage exemption is claimed	59.407(c)(1)
<input type="checkbox"/> The VOC content of each coating for which the exemption is claimed	59.407(c)(2)
<input type="checkbox"/> The annual sales for each coating for which the exemption is claimed	59.407(c)(3)
<input type="checkbox"/> The megagrams of VOC contained in each coating for which the exemption is claimed, and for all coatings combined for which the exemption is claimed, for the time period the exemption is claimed	59.407(c)(4)
REPORTS	
Initial report for all manufacturers and importers:	
<input type="checkbox"/> Name and mailing address of the manufacturer or importer	59.408(b)(1)

Requirement	Regulation Reference
<input type="checkbox"/> The street address of each one of the manufacturer's or importer's facilities in the U.S. producing, packaging, or repackaging any architectural coating subject to this subpart.	59.408(b)(2)
<input type="checkbox"/> List of categories of coatings in Table 1 of the regulation for which the manufacturer's or importer's coatings meet the definition	59.408(b)(3)
<input type="checkbox"/> Explanation of date code, if applicable	59.408(b)(4)
Annual report for coatings for which the optional recycled coating credit is applied:	
<input type="checkbox"/> Minimum post-consumer content of coatings	59.408(c)(1)
<input type="checkbox"/> Volume of post-consumer coating received for recycling	59.408(c)(2)
<input type="checkbox"/> Volume of post-consumer coating received that was unusable	59.408(c)(3)
<input type="checkbox"/> Volume of virgin materials used	59.408(c)(4)
<input type="checkbox"/> Volume of recycled coating manufactured or imported	59.408(c)(5)
Annual report for manufacturers and importers using the optional exceedance fee:	
<input type="checkbox"/> Name and address	59.408(d)(1)
<input type="checkbox"/> A list of all coatings and the associated coating categories for which the exceedance fee is being used	59.408(d)(2)
<input type="checkbox"/> VOC content of each coating that exceeds the applicable VOC content limit in Table 1 of the regulation	59.408(d)(3)
<input type="checkbox"/> Excess VOC content of each coating product for which a fee is paid	59.408(d)(4)
<input type="checkbox"/> Total annual volume of all coatings for which a fee is paid	59.408(d)(5)
<input type="checkbox"/> The annual fee for each coating	59.408(d)(6)
<input type="checkbox"/> The total annual fee for all coatings	59.408(d)(7)
Annual report for manufacturers and importers using the optional tonnage exemption:	
<input type="checkbox"/> A list of all coatings and the associated coating categories in Table 1 of the regulation for which the tonnage exemption was claimed	59.408(e)(1)
<input type="checkbox"/> The VOC content of each coating for which the exemption was claimed	59.408(e)(2)
<input type="checkbox"/> The actual sales for each coating for which the exemption was claimed	59.408(e)(3)
<input type="checkbox"/> The total megagrams of VOC contained in all the coatings for which the exemption was claimed	59.408(e)(4)

