

**SUPPORTING STATEMENT  
ENVIRONMENTAL PROTECTION AGENCY**

**NESHAP for Miscellaneous Metal Parts and Products (40 CFR Part 63, Subpart M MMM) (Renewal)**

**1. Identification of the Information Collection**

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

NESHAP for Miscellaneous Metal Parts and Products (40 CFR Part 63, Subpart M MMM) (Renewal), EPA ICR Number 2056.04, OMB Control Number 2060-0486.

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

The National Emission Standards for Hazardous Air Pollutants (NESHAP) for Miscellaneous Metal Parts and Products (40 CFR part 63, subpart M MMM) were proposed on August 13, 2002, and promulgated on January 2, 2004. These regulations apply to new, reconstructed, and existing facilities with miscellaneous metal parts and products surface coating operations, and associated equipment or containers used for mixing, conveying, storage, or waste. New facilities include those that commenced construction or reconstruction after the date of proposal. This information is being collected to assure compliance with 40 CFR part 63, subpart M MMM.

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/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 U.S. Environmental Protection Agency (EPA) regional office.

Over the next three years, an average of 4,992 respondents per year will be subject to the standard, and no additional respondents per year will become subject to the standard.

The burden to the “Affected Public” may be found below in Table 1: Annual Respondent Burden and Cost – NESHAP for Miscellaneous Metal Parts and Products (40 CFR Part 63, Subpart M MMM) (Renewal). The burden to the “Federal Government” is attributed entirely to work performed by either Federal employees or government contractors. The burden to the “Federal Government” may be found below in Table 2: Average Annual EPA Burden and Cost – NESHAP for Miscellaneous Metal Parts and Products (40 CFR Part 63, Subpart M MMM) (Renewal).

The Office of Management and Budget (OMB) approved the current Information Collection Agency (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 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. 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/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, hazardous air pollutant (HAP) emissions (predominantly xylene, toluene, methyl ethyl ketone, phenol, and cresols/cresylic acid) from miscellaneous metal parts and products surface coating operations cause or contribute to air pollution that may reasonably be anticipated to endanger public health or welfare. Therefore, the NESHAP was promulgated for this source category at 40 CFR part 63, subpart MMMM.

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

The recordkeeping and reporting requirements in the standard ensures 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 standard. Continuous emission monitors are used to ensure compliance with the standard at all times. During the performance test a record of the operating parameters under which compliance was achieved may be recorded and used to determine compliance in place of a continuous emission monitor.

The notifications required in the standard 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, leaks are being detected and repaired, and the standard is 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.

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

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

#### **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 (76 FR 26900) on May 9, 2011. No comments were received on the burden published in the Federal Register.

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

The Agency's industry experts have been consulted, and the Agency's 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 Online Tracking Information System (OTIS) which is operated and maintained by the EPA Office of Compliance. OTIS 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.

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. In developing this ICR, we consulted with: 1) the National Electrical Manufacturers Association (NEMA), at (703) 841-3245; 2) Superior Essex, at (770) 657-6000; and 3) MWS Wire Industries, at (818)

991-8553. In response to comments from NEMA, EPA corrected errors in the per-occurrence labor hour burden for the magnet wire industry (see Table 1 below). EPA also updated the respondent universe to reflect 11 magnet wire facilities, 8 of which are active members of the NEMA Magnet Wire Section Environmental Health and Safety (EHS) Committee.

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.

### **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 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.

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 Codes

The respondents to the recordkeeping and reporting requirements are owners or operators of facilities that perform surface coating of miscellaneous metal parts and products. The United States Standard Industrial Classification (SIC) codes for the respondents affected by the standards, and the corresponding North American Industry Classification System (NAICS) codes are listed in the following table.

Standard (40 CFR Part 63, Subpart Mmmm)	SIC Codes	NAICS Codes
Engines and Turbines, Aircraft Engines and Engine Parts, Aircraft Parts and Auxiliary Equipment	3724, 3728, 376X,	336413, 336414, 336415, 54171
Motor Vehicles and Motor Vehicle Equipment	3711, 3713, 3714, 3292, 3429, 3465, 3694, 3829	335312, 336111, 336211, 336312, 33632, 33633, 33634, 33637, 336399
Rolling, Drawing, and Extruding of Nonferrous Metals	3354, 3365, 3442, 3446	331316, 331524, 332321, 332323
Farm and Garden Machinery and Equipment, Construction Machinery and Equipment	3511, 3519, 352X, 353X,	33312, 333611, 333618
Coat Products by Job and Customer Rather than Coating the One Product or Group of Products	3441, 3471, 3499, 3999	332312, 332722, 332813, 332991, 332999, 334119, 336413, 339999
Motor Vehicles and Motor Vehicle Equipment	3711, 3713, 3716	33612, 336211
Rolling, Drawing, and Extruding of Nonferrous Metal Wire	3351, 3357	331319, 331422, 335929
Prefabricated Metal Buildings and Components	3448	332311
Metal Shipping Barrels, Drums, Kegs, and Pails	2655, 3089, 3325, 3412, 3443, 5085	33242, 81131, 322214, 326199, 331513, 332439
Primary Metal Industries	331X, 332X, 336X, 3399	331111, 331513, 33121, 331221, 331511
Transportation Equipment	3731, 3743, 4011, 4741	33651, 336611, 482111

Transportation Equipment	3083, 3354, 3713, 3714, 3716, 375X, 3792	3369, 331316, 336991, 336211, 336112, 336213, 336214, 336399
Fabricated Rubber Products (applied to metal)	3061, 3069, 3479	326291, 326299
Fabricated Structural Metal Products	3441, 3448	332311, 332312
Transportation Equipment Not Listed Otherwise	3711, 3519, 3714, 3715, 3795, 3621,	336212, 336999, 56211 33635, 56121, 8111,

#### 4(b) Information Requested

##### (i) Data Items

In this ICR, all the data that is recorded or reported is required by the NESHAP for Miscellaneous Metal Parts and Products (40 CFR Part 63, Subpart M MMM).

A source must make the following reports:

<b>Notification Reports</b>	
Initial Notification	63.3910(b)
Notification of Compliance Status	63.3910(c)
Notification of construction or reconstruction	63.9(b)
Notification of actual date of initial startup	63.9(b)
Notification of intent to conduct a performance test	63.7(b); 63.9(e); 63.3910(a)
Periodic reports (semiannual)	63.3920(a)
Statement of compliance (if no exceedances occurred)	63.3920(a)
Average monitoring data for any periods where exceedances or excursions occur	63.3920(a)
Periods of monitoring system downtime	63.3920(a)
Results of any performance tests	63.3920(b)
Startup, shutdown, malfunction reports	63.3920(c)

A source must keep the following records:

<b>Recordkeeping</b>	
Five-year retention of records	63.10(b)(1)
Material formulation data	63.3930(b)
Records of HAP content calculations	63.3930(c)
Copies of Notifications and Reports	63.3930(a)
Records of names of materials used	63.3930(d)

<b>Recordkeeping</b>	
HAP fractions in each material used	63.3930(e)
Coating solids fraction in each material used	63.3930(f)
Density of materials used	63.3930(g)
Documentation of waste material shipped offsite	63.3930(h)
Startup, shutdown, and malfunction plan/records	63.6(e)(3); 63.3900(c); 63.3930(k)
Documentation of control device performance tests	63.10(b)(2); 63.3930(k)
Values measured by continuous monitoring systems	63.3968
Monitoring system calibrations, maintenance	63.3968
Periods of monitoring system failure/shutdown	63.3968

### Electronic Reporting

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

Also, regulatory agencies in cooperation with the respondents continue to create reporting systems to transmit data electronically. However, electronic reporting systems are still not widely used. At this time, it is estimated that approximately 20 percent of the respondents use electronic reporting.

### **(ii) Respondent Activities**

<b>Respondent Activities</b>
Read instructions.
Install, calibrate, maintain, and operate CMS for opacity, or for pressure drop and liquid supply pressure for the control device.
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 or 311 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

<b>Respondent Activities</b>
maintaining information.
Develop, acquire, install, and utilize technology and systems for the purpose of disclosing and providing information.
Train personnel to be able to respond to a collection of information.
Transmit, or otherwise disclose the information.

Currently sources are using monitoring and reporting equipment that provide parameter data in an automated way (e.g., continuous parameter monitoring system). Although personnel at the source still need to evaluate the data, this type of monitoring equipment has significantly reduced the burden associated with monitoring and recordkeeping.

## **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>
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 Online Tracking Information System (OTIS).

### **5(b) Collection Methodology and Management**

Following notification of startup, the reviewing authority could 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 OTIS which is operated and maintained by EPA's Office of Compliance. OTIS is EPA's database for the collection,



maintenance, and retrieval of compliance data for approximately 125,000 industrial and government-owned facilities. EPA uses the OTIS 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/operator for five years.

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

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. 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 Miscellaneous Metal Parts and Products (40 CFR Part 63, Subpart MMMM) (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. Wherever 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 2,254,948 (Total Labor Hours from Table 1 below). 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	\$121.42 (\$57.82 + 110%)
Technical	\$99.14 (\$47.21 + 110%)
Clerical	\$49.81 (\$23.72 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, September 2011, “Table 2. Civilian Workers, by occupational and industry group.” The rates are from column 1, “Total compensation.” The rates have been increased by 110 percent to account for the benefit packages available to those employed by private industry.

### (ii) Estimating Capital/Startup and Operation and Maintenance Costs

The type of industry costs associated with the information collection activities in the subject standard 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 monitor and other costs such as photocopying and postage.

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

<b>Capital/Startup vs. Operation 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)
CPMS – magnet wire facilities	\$0	0	\$0	\$50,000	11	\$550,000
CPMS – other facilities <sup>1</sup>	\$0	0	\$0	\$5,000	100	\$500,000
Total			\$0			\$1,050,000

<sup>1</sup> An estimated 2 percent of non-magnet wire facilities have installed add-on control devices. Other facilities comply with the standards by reformulating their coating materials.

The total capital/startup costs for this ICR are \$0. This is the total of column D in the above table.

The total operation and maintenance (O&M) costs for this ICR are \$1,050,000. 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 \$1,050,000. These are recordkeeping costs.

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

The only costs to the Agency are those costs associated with analysis of the reported information. EPA's overall compliance and enforcement program includes activities such as the examination of records maintained by the respondents, 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 \$6,208,990.

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), 2011 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: Average Annual EPA Burden and Cost – NESHAP for Miscellaneous Metal Parts and Products (40 CFR Part 63, Subpart Mmmm) (Renewal).

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

Based on our research for this ICR, on average over the next three years, approximately 4,992 existing respondents will be subject to the standard. It is estimated that no additional respondents per year will become subject. The overall average number of respondents, as shown in the table below, is 4,992 per year.

The number of respondents is calculated using the following table that addresses the three years covered by this ICR.

<b>Number of Respondents</b>					
	Respondents That Submit Reports		Respondents That Do Not Submit Any Reports		
Year	(A) Number of New Respondents <sup>1</sup>	(B) Number of Existing Respondents	(C) Number of Existing Respondents that keep records but do not submit reports	(D) Number of Existing Respondents That Are Also New Respondents	(E) Number of Respondents (E=A+B+C-D)
1	0	4,992	0	0	4,992
2	0	4,992	0	0	4,992
3	0	4,992	0	0	4,992
Average	0	4,992	0	0	4,992

<sup>1</sup> New respondent include sources with constructed, reconstructed and modified affected facilities.

Column D is subtracted to avoid double-counting respondents. As shown above, the average Number of Respondents over the three year period of this ICR is 4,992.

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 Performance Test	0	1	0	0
Notification of Compliance Status	0	1	0	0
Semiannual Report	4,992	2	0	9,984
			Total	9,984

The number of Total Annual Responses is 9,984.

The total annual labor costs are \$216,067,118. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NESHAP for Miscellaneous Metal Parts and Products (40 CFR Part 63, Subpart MMMM) (Renewal).

## **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 (below), respectively, and summarized below.

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

The total annual labor hours are 2,254,948 at a cost of \$216,067,118. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NESHAP for Miscellaneous Metal Parts and Products (40 CFR Part 63, Subpart M MMM) (Renewal).

Furthermore, the annual public reporting and recordkeeping burden for this collection of information is estimated to average 226 hours per response.

The total annual capital/startup and O&M costs to the regulated entity are \$1,050,000. 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 137,779 labor hours at a cost of \$6,208,990. See below Table 2: Average Annual EPA Burden and Cost – NESHAP for Miscellaneous Metal Parts and Products (40 CFR Part 63, Subpart M MMM) (Renewal).

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

There is an adjustment decrease in the labor hours for the respondent as compared to the most recently approved ICR. This decrease is not due to any program changes. The decrease reflects a correction in the “person-hours per occurrence” estimate for magnet wire facilities in Table 1 based on comments received from industry consultation. The per-person burden hour estimate for line items “5.1 Gather information and monitor” and “6.1 Process/compile and review” in the previous ICR were incorrectly based on burden estimates for the entire industry sector rather than a single magnet wire facility, and therefore were inflated by a factor of ten.

There is an increase in the total O&M costs in this ICR as compared to the previous ICR. This change reflects an update in the respondent universe for the magnet wire industry. Based on comments received from consultation, EPA updated the number of magnet wire facilities from 10 to 11 to more accurately reflect the potential respondent universe.

In addition, there is an increase in burden costs to both the respondent and the Agency due to an adjustment in labor rates. This ICR uses the most recent labor rates from the Bureau of Labor Statistics in calculating the labor costs.

**6(g) Burden Statement**

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 226 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 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-2011-0254. An electronic version of the public docket is available at <http://www.regulations.gov/> which may be used to obtain a copy of the draft collection of information, submit or view public comments, access the index listing of the contents of the docket, and to access those documents in the public docket that are available electronically. When in the system, select "search," then key in the docket ID number identified in this document. The documents are also available for public viewing at the Enforcement and Compliance Docket and Information Center in the EPA Docket Center (EPA/DC), EPA West, Room 3334, 1301 Constitution Ave., NW, Washington, DC. The EPA Docket Center Public Reading Room is open from 8:30 a.m. to 4:30 p.m., Monday through Friday, excluding legal holidays. The telephone number for the Reading Room is (202) 566-1744, and the telephone number for the docket center is (202) 566-1752. Also, you can send comments to the Office of Information and Regulatory Affairs, Office of Management and Budget, 725 17th Street, NW, Washington, DC 20503, Attention: Desk Officer for EPA. Please include the EPA Docket ID Number EPA-HQ-OECA-2011-0254 and OMB Control Number 2060-0486 in any correspondence.

**Part B of the Supporting Statement**

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

**Table 1: Annual Respondent Burden and Cost – NESHAP for Miscellaneous Metal Parts and Products (40 CFR Part 63, Subpart Mmmm) (Renewal)**

Burden item	(A) Person hours per occurrence	(B) No. of occurrences per respondent per year	(C) Person hours per respondent per year (C=AxB)	(D) Respondents per year <sup>a</sup>	(E) Technical person- hours per year (E=CxD)	(F) Management person hours per year (Ex0.05)	(G) Clerical person hours per year (Ex0.1)	(H) Cost, \$ <sup>b</sup>
1. Read rule and instructions	4	1	4	0	0	0	0	\$0
2. Plan activities	8	1	8	0	0	0	0	\$0
3. Training	8	1	8	0	0	0	0	\$0
4. Create, test, and research and development	0	1	0	0	0	0	0	\$0
5. Gather information and monitor	18	12	216	4,981	1,075,896	53,794.8	107,589.6	\$118,555,132.00
5.1 Gather information and monitor - Magnet wire facilities <sup>c</sup>	36	12	432	11	4,752	237.6	475.2	\$523,632.38
6. Process/Compile and Review	12	12	144	4,981	717,264	35,863.2	71,726.4	\$79,036,754.68
6.1 Process/Compile and Review - Magnet wire facilities <sup>c</sup>	24	12	288	11	3,168	158.4	316.8	\$349,088.26
7. Semiannual Reports <sup>d</sup>	8	2	16	4,992	79,872	3,993.6	7,987.2	\$8,801,255.42
<b>Subtotal for Reporting Requirements</b>					<b>2,163,094.8</b>			
<b>Recordkeeping requirements</b>								
8. Record/disclose information <sup>e</sup>	4	2	8	4,992	39,936	1,996.8	3,993.6	\$4,400,627.72
9. Store/File information <sup>e</sup>	4	2	8	4,992	39,936	1,996.8	3,993.6	\$4,400,627.72
10. LDAR reporting and recordkeeping	0	0	0	0	0	0	0	\$0
<b>Subtotal for Recordkeeping Requirements</b>					<b>91,852.8</b>			
					1,960,824	98,041.2	196,082.4	
<b>TOTAL LABOR BURDEN AND COST (rounded)</b>					<b>2,254,948</b>			<b>\$216,067,118</b>

**Assumptions:**

- <sup>a</sup> We have assumed that there are approximately 4,992 existing sources currently subject to this rule, with no additional new or reconstructed sources becoming subject to the rule over the next three years of this ICR.
- <sup>b</sup> This ICR uses the following labor rates: \$121.42 per hour for Executive, Administrative, and Managerial labor; \$99.14 per hour for Technical labor, and \$49.81 per hour for Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, September, 2011 “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.
- <sup>c</sup> We assumed that the eleven magnet wire facilities on average incorporate a higher number of processes that’s typical for the industry. The burden of gathering information, monitoring, and processing compiling, and reviewing has been estimated based on comments received from NEMA.
- <sup>d</sup> We have assumed that each respondent will take eight hours twice per year to complete the semiannual reports.
- <sup>e</sup> We have assumed that each respondent will take four hours twice per year to complete task.



**Table 2: Average Annual EPA Burden and Cost – NESHAP for Miscellaneous Metal Parts and Products (40 CFR Part 63, Subpart Mmmm) (Renewal)**

Burden item	(A) Person hours per occurrence	(B) No. of occurrences per respondent per year	(C) Person hours per respondent per year (C=AxB)	(D) Respondents per year <sup>a</sup>	(E) Technical person- hours per year (E=CxD)	(F) Management person hours per year (Ex0.05)	(G) Clerical person hours per year (Ex0.1)	(H) Cost, \$ <sup>b</sup>
1. Initial performance and test	N/A	0	0	0	0	0	0	0
2. Repeat performance test	N/A	0	0	0	0	0	0	0
3. Report review			0	0				
a) Initial notification	8	0	0	0	0	0	0	0
b) Notification of performance test	N/A	0	0	0	0	0	0	0
c) Notification of compliance status	12	0	0	0	0	0	0	0
d) Semiannual report <sup>c</sup>	12	2	24	4,992	119,808	5,990.4	11,980.8	\$6,208,989.70
<b>Total Burden Hours and Costs</b>					<b>119,808</b>	<b>5,990.4</b>	<b>11,980.8</b>	<b>\$6,208,989.70</b>
<b>TOTAL ANNUAL BURDEN and COSTS (rounded)</b>						<b>137,779</b>		<b>\$6,208,990</b>

**Assumptions:**

<sup>a</sup> We have assumed that there are approximately 4,992 existing sources currently subject to this rule, with no additional new or reconstructed sources becoming subject to the rule over the next three years of this ICR.

<sup>b</sup> This cost is based on the following labor rates which incorporates a 1.6 benefits multiplication factor to account for government overhead expenses: \$62.27 for Managerial (GS-13, Step 5, \$38.92 x 1.6), \$46.21 for Technical (GS-12, Step 1, \$28.88 x 1.6), and \$25.01 Clerical (GS-6, Step 3, \$15.63 x 1.6). These rates are from the Office of Personnel Management (OPM) “2011 General Schedule” which excludes locality rates of pay.

<sup>c</sup> We have assumed that each respondent will take 12 hours twice a year to complete semiannual report.