

**SUPPORTING STATEMENT  
ENVIRONMENTAL PROTECTION AGENCY**

**NESHAP for the Surface Coating of Large Household and Commercial Appliances (40 CFR Part 63, Subpart NNNN) (Renewal)**

**1. Identification of the Information Collection**

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

NESHAP for the Surface Coating of Large Household and Commercial Appliances (40 CFR Part 63, Subpart NNNN) (Renewal), EPA ICR Number 1954.05, OMB Control Number 2060-0457

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

The National Emission Standards for Hazardous Air Pollutants (NESHAP) for the Surface Coating of Large Household and Commercial Appliances (40 CFR Part 63, Subpart NNNN) were proposed on December 22, 2000, and promulgated on July 23, 2002. These regulations apply to both existing and new facilities that perform surface coating of large household and commercial appliances and related parts where the total Hazardous Air Pollutants (HAPs) emitted are greater than or equal to 10 tons per year of any one HAP, or where the total HAPs emitted are greater than or equal to 25 tons per year of any combination of HAPs. New facilities include those that commenced construction or reconstruction after the date of the proposal. This information is being collected to assure compliance with 40 CFR part 63, subpart NNNN.

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 U. S. 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 each plant site has only one respondent (i.e., the owner/operator of the plant site).

Over the next three years, an average of 102 respondents per year will be subject to the standard, and four additional respondents per year will become subject to the standard over the three-year period of this ICR.

The active (previous) ICR had the following “Terms of Clearance:”

When this ICR is renewed, EPA should review the respondent burden, universe, response number, labor rates, and capital costs and ensure these estimates have been updated.

EPA addressed each item of concern in the TOC. The respondent burden, universe, response number, and labor rates were updated and incorporated into the burden tables for both the “Affected Public” and the “Federal Government.” The capital costs were also updated to reflect changes in the respondent universe.

All of the large household and commercial appliance surface coating facilities in the United States are owned and operated by the large household and commercial appliance manufacturing industry (the “Affected Public”). None of the facilities in the United States are owned by state, local, tribal or the Federal government. They are all privately owned, for-profit businesses. The burden to the “Affected Public” may be found below in Table 1: Annual Respondent Burden and Cost - NESHAP for the Surface Coating of Large Household and Commercial Appliances (40 CFR Part 63, Subpart NNNN) (Renewal). The burden to the “Federal Government” is attributed entirely to work performed by Federal employees or government contractors. This burden may be found below in Table 2: Average Annual EPA Burden and Cost - NESHAP for the Surface Coating of Large Household and Commercial Appliances (40 CFR Part 63, Subpart NNNN) (Renewal).

## **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 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 large household and commercial

appliance surface coating facilities either 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 NNNN.

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

The recordkeeping and reporting requirements in the standard 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 standard. Continuous emission monitors are used to ensure compliance with the standard at all times.

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 and/or leaks are being detected and repaired and the standard 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.

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

The recordkeeping and reporting requested is required under 40 CFR part 63, subpart NNNN.

#### **3(a) Non-duplication**

If the subject standards have not been delegated, the information is sent 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 their 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 Office of Management and Budget (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 has consulted industry experts and internal data sources to project the number of effected facilities and industry growth over the next three years. 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 EPA's Office of Compliance. OTIS is EPA's 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 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 and the standard has been previously reviewed to determine the minimum information needed for compliance purposes. In developing this ICR, we contacted: 1) the Association of Home Appliance Manufacturers (AHAM), at (202) 872-5955; 2) Whirlpool Corporation, at (269) 923-3614; and 3) the Air-Conditioning, Heating, and Refrigeration Institute (AHRI) at (703) 524-8800. A comment was received from Whirlpool Corporation indicating that the annual O&M time varies from 24 to 80 hours at a technicians pay grade depending on the size of the facility, sophistication of management systems, and the amount of field verification checks. Based on this comment, the estimate annual Operations and Maintenance (O&M) costs were updated in Section 6(b)(iii).

It is our policy to respond after a thorough review of comments received since the last ICR renewal as well as to 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 required standards. Requirements for information gathering and recordkeeping are useful techniques to ensure that good operation and maintenance practices are applied and emission limitations are met. If the information required by these standards was collected less frequently, the proper operation and maintenance of control equipment and the possibility of detecting violations would be less likely.

### **3(e) General Guidelines**

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

These standards require affected facilities 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 with 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 frequently have violations extending beyond the five years. EPA would be prevented from pursuing the worst violators due to either 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 those that perform surface coating of large household and commercial appliances and related parts. The United States Standard Industrial Classification (SIC) codes for the respondents affected by the standards, which correspond to the North American Industry Classification System (NAICS) codes, are listed below for this source category.

<b>Standard (40 CFR Part 63, Subpart NNNN)</b>	<b>SIC Codes</b>	<b>NAICS Codes</b>
Household Cooking Appliance Manufacturing	3631	335221
Household Refrigerator and Home Freezer Manufacturing	3632	335222
Household Laundry Equipment Manufacturing	3633	335224
Other Major Household Appliance Manufacturing	3639	335228
Commercial laundry, Drycleaning, and Pressing Machine Manufacturing	3582	333312
Air-Conditioning and Warm Air Heating Equipment and Commercial and Industrial Refrigeration Equipment Manufacturing	3585	333415
Other Commercial and Service Industry Machinery Manufacturing	3589	333319

### **4(b) Information Requested**

**(i) Data Items**

In this ICR, all the data that is recorded or reported is required by NESHAP for the Surface Coating of Large Household and Commercial Appliances (40 CFR Part 63, Subpart NNNN).

A source must make the following reports:

<b>Notifications</b>	
Initial notification	63.4110(a)(1), 63.9(b)
Notification of compliance status	63.4110(a)(2), 63.4110(b), 63.9(h)
Notification of construction or reconstruction	63.5
Notification of actual startup	63.9(b)
Notification of performance test	63.7(b)

<b>Reports</b>	
Semiannual report	63.4120
Excess emissions report	63.4120(c),(d),(e),(f),(g)
Report of performance test	63.4120(h)
Startup, shutdown, malfunction report	63.4120(j)

A source must keep the following records:

<b>Recordkeeping</b>	
Five year retention of records	63.4131(b), 63.10(b)
Material formulation data	63.4130(b)
Records of HAP content calculations	63.4131(c)
Copies of notifications and reports	63.4131(a)
Records of names of materials used	63.4131(d)
HAP fractions in each material used	63.4131(e)
Coating solids fraction in each material used	63.4131(f)
Density of materials used	63.4131(g)
Documentation of waste material shipped offsite	63.4131(h)
Start-up, shutdown, and malfunction plan/records	63.4131(j),(k),63.6(e)
Documentation of control device performance tests	63.4131(k),63.10(b)
Values measured by continuous monitoring systems	63.4131(k)
Monitoring system calibrations, maintenance	63.4131(k)

<b>Recordkeeping</b>	
Periods of monitoring system failure/shutdown	63.4131(j),(k)

### 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 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.
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.
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>
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 quality control plan for CMS 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 the AFS 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 requirements the minimum needed to ensure compliance and, therefore, cannot reduce them further for small entities. To the extent that larger businesses can use economies of scale to reduce their burden, the overall burden will be reduced. In the Background Information for the Large Appliance



Surface Coating Operations NESHAP<sup>a</sup>, 57 percent of the parent companies affected by proposed action were estimated to be small entities as defined by the Small Business Administration. The Agency assumes that 57 percent of the 102 facilities affected by this ICR, or 58 facilities, are small entities.

#### **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 the Surface Coating of Large Household and Commercial Appliances (40 CFR Part 63, Subpart NNNN) (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. Specific tasks and major assumptions have been identified where appropriate. 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 32,634 hours (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%)

---

<sup>a</sup> National Emission Standards for Hazardous Air Pollutants (NESHAP) for Source Category: Large Appliances Surface Coating Operations – Background Information for Proposed Standards, September 2000, EPA-453/R-00-006

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 and Operations and Maintenance Costs

The type of industry costs associated with the information collection activity 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. 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 <sup>1</sup>	(F) Number of Respondents with O&M	(G) Total O&M, (E X F)
CEM	\$16,000	4	\$64,000	\$5,200	102	\$530,400

<sup>1</sup>Comments received from Whirlpool Corporation during industry consultation suggested that annual O&M cost can vary from 24 to 80 hours at a technicians pay grade. To calculate annual O&M costs, an average of 52 hours was assumed and multiplied by the technical labor rate of \$99.14.

The total capital/startup costs for this ICR are \$64,000. This is the total of column D in the above table.

The total operating and maintenance (O&M) costs for this ICR are \$530,400. 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 \$594,400. 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 \$138,060.

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

Managerial	\$62.27	(GS-13, Step 5, \$38.92 x 1.6)
Technical	\$46.21	(GS-12, Step 1, \$28.88 x 1.6)
Clerical	\$25.01	(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. 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 the Surface Coating of Large Household and Commercial Appliances (40 CFR Part 63, Subpart NNNN) (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 98 existing respondents will be subject to the standard. It is estimated that an additional four respondents per year will become subject. The overall average number of respondents, as shown in the table below, is 102 per year.

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

<b>Number of Respondents</b>					
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	4	94	0	0	98
2	4	98	0	0	102
3	4	102	0	0	106
Average	4	98	0	0	102

<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 102.

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	4	1	0	4
Notification of compliance status	4	1	0	4

<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
Notification of construction/reconstruction	4	1	0	4
Notification of actual startup	4	1	0	4
Notification of performance test	4	1.2	0	4.8
Report of performance test	4	1.2	0	4.8
Semiannual report	102	2	0	204
Excess emissions report	102	0.5	0	51
Startup, shutdown, malfunction report	102	0.5	0	51
<b>Total</b>				<b>332 (Rounded)</b>

The number of Total Annual Responses is 332.

The total annual labor costs are \$3,126,918. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NESHAP for the Surface Coating of Large Household and Commercial Appliances (40 CFR Part 63, Subpart NNNN) (Renewal).

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

The detailed bottom line burden hours and cost calculations for both 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 32,634, at a cost of \$3,126,918. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost - NESHAP for the Surface Coating of Large Household and Commercial Appliances (40 CFR Part 63, Subpart NNNN) (Renewal).

Furthermore, the annual public reporting and recordkeeping burden for this collection of information is estimated to average 98 hours per response.

The total annual capital and O&M costs to the regulated entity are \$594,400. These costs are detailed above 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 3,064 labor hours at a cost of \$138,060. See below Table 2: Average Annual EPA Burden and Cost - NESHAP for the Surface Coating of Large Household and Commercial Appliances (40

CFR Part 63, Subpart NNNN) (Renewal).

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

There is an adjustment increase in the total estimated burden hours and costs for both the respondents and the Agency as currently identified in the OMB Inventory of Approved Burdens. This increase is not due to any program changes. This change is due to an increase in the average number of respondents subject to the standard, and an increase in labor rates. This ICR uses updated labor rates for each of the three labor categories.

There is also an increase in the O&M costs to the respondents. The costs were updated to reflect comments received during consultation.

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

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 98 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-2011-0259. 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 Enforcement and Compliance Docket and Information Center Docket 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 Office for EPA. Please include the EPA Docket ID Number EPA-HQ-OECA-2011-0259 and OMB Control Number 2060-0457 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 the Surface Coating of Large Household and Commercial Appliances (40 CFR Part 63, Subpart NNNN) (Renewal)**

Burden Item	(A) Person-Hours per occurrence	(B) Number of occurrences per year	(C) Person-Hours per respondent per year (C=A*B)	(D) Respondents per year <sup>a</sup>	(E) Technical person-hours per year (E=C*D)	(F) Management person-hours per year (F=E*0.05)	(G) Clerical person-hours per year (G=E*0.1)	(H) Annual costs (\$) <sup>b</sup>
1 Read rule and instructions <sup>c</sup>	4	1	4	102	408	20.4	40.8	\$44,958.34
2 Plan activities <sup>d</sup>	8	1	8	102	816	40.8	81.6	\$89,916.67
3 Training <sup>d</sup>	8	1	8	102	816	40.8	81.6	\$89,916.67
4 Create, test, and research and development	1	0	0	0	0	0	0	\$0
5 Gather information, monitor, and inspect <sup>e</sup>	12	12	144	102	14,688	734.4	1,468.8	\$1,618,500.10
6 Process/compile and review <sup>f</sup>	8	12	96	102	9,792	489.6	979.2	\$1,079,000.06
7 Complete reports <sup>g</sup>	8	2	16	102	1,632	81.6	163.2	\$179,833.34
<b>Subtotal for Reporting Requirements</b>					<b>32,374.8</b>			
8 Record/disclose <sup>h</sup>	1	2	2	102	180	9	18	\$19,834.56
9 Store/file	0.25	2	0.5	102	45	2.25	4.5	\$4,958.64
10 LDAR reporting and recordkeeping	0	0	0	0	0	0	0	\$0
<b>Subtotal for Recordkeeping Requirements</b>					<b>258.8</b>			
					<b>28,377</b>	<b>1,418.9</b>	<b>2,837.7</b>	
<b>TOTAL ANNUAL BURDEN AND COST (rounded)</b>						<b>32,634</b>		<b>\$3,126,918</b>

**Assumptions:**

<sup>a</sup> We have assumed that the average number of respondents that will be subject to the rule will be 102. There will be four additional new sources that will become subject to the rule over the three-year period 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% to account for the benefit packages available to those employed by private industry.

<sup>c</sup> We have assumed that each respondent will take 4 hours to read the rule and instructions.

<sup>d</sup> We have assumed that it will take eight hours for each respondent to plan activities and eight hours for training.

<sup>e</sup> We have assumed that each respondent will take twelve hours twelve times per year to complete task.

<sup>f</sup> We have assumed that each respondent will take eight hours twelve times per year to complete task.

<sup>g</sup> We have assumed that each respondent will take eight hours twice per year to complete reports.

<sup>h</sup> We have assumed that each respondent will take one hour two times per week to record and disclose information.

**Table 2: Average Annual EPA Burden and Cost - NESHAP for the Surface Coating of Large Household and Commercial Appliances (40 CFR Part 63, Subpart NNNN) (Renewal)**



Activity	(A) Person- hours per activity	(B) Number of activities per year	(C) Technical person- hours per year (C=A*B) <sup>a</sup>	(D) Management person- hours per year (D=C*0.05)	(E) Clerical person- hours per year (E=C*0.1)	(F) Annual Costs (\$/yr) <sup>b</sup>
1 Initial performance and test <sup>c</sup>	24	4	96	4.8	9.6	\$4,975.15
2 Repeat performance test <sup>d</sup>	24	1	24	1.2	2.4	\$1,243.79
3 Report review						
a) Initial notification <sup>e</sup>	8	4	32	1.6	3.2	\$1,658.38
b) Notification of performance test <sup>e</sup>	8	4	32	1.6	3.2	\$1,658.38
c) Notification of compliance status <sup>e</sup>	8	4	32	1.6	3.2	\$1,658.38
d) Semiannual reports <sup>f</sup>	12	204	2,448	122.4	244.8	\$126,866.38
<b>Subtotal Labor Burden and Cost</b>			<b>2,664</b>	<b>133</b>	<b>266</b>	<b>\$138,060.47</b>
<b>TOTAL ANNUAL BURDEN AND COST (rounded)</b>				<b>3,064</b>		<b>\$138,060</b>

**Assumptions:**

<sup>a</sup> We have assumed that the average number of respondents that will be subject to the rule will be 102. There will be four additional sources that will become subject to the rule over the three-year period 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: Managerial rate of \$62.27 (GS-13, Step 5, \$38.92 x 1.6), Technical rate of \$46.21 (GS-12, Step 1, \$28.88 x 1.6), and Clerical rate of \$25.01 (GS-6, Step3, \$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 24 hours four times per year to complete task.

<sup>d</sup> We have assumed that each respondent will take 24 hours once per year to repeat performance test because of failure.

<sup>e</sup> We have assumed that each respondent will take eight hour four times per year to review notification reports.

<sup>f</sup> We have assumed that each respondent will take 12 hours to review semiannual reports.