

**SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY**

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

1. Identification of the Information Collection

1(a) Title of the Information Collection

NSPS for Surface Coating of Plastic Parts for Business Machines (40 CFR Part 60, Subpart TTT) (Renewal), EPA ICR Number 1093.10, OMB Control Number 2060-0162.

1(b) Short Characterization/Abstract

The New Source Performance Standards (NSPS) for Surface Coating of Plastic Parts for Business Machines were proposed on January 8, 1986, promulgated on January 29, 1988, and amended on October 17, 2000. These regulations apply to new facilities that perform industrial surface coating operations on plastic parts for use in the manufacture of business machines: each spray booth that applies prime coats, color coats, texture coats or touch-up coats. New facilities include those that commenced construction, modification, or reconstruction after the date of the proposal. This information is being collected to assure compliance with 40 CFR part 60, subpart TTT.

In general, all NSPS standards require initial notifications, performance tests, and periodic reports 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 NSPS.

Any owner/operator subject to the provisions of this part shall maintain a file of these measurements, and retain the file for at least two years following the date of such measurements, maintenance reports, and records. All reports are sent to the delegated state or local authority. In the event that there is no such delegated authority, the reports are sent directly to the U. S. Environmental Protection Agency (EPA) regional office.

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

Over the next three years, an average of 10 respondents per year will be subject to the standard, and no additional respondents will become subject to the standard.

The Office of Management and Budget (OMB) approved the currently active ICR without any "Terms of Clearance."

The “Affected Public” is owners or operators of facilities that conduct industrial surface coating of plastic parts for use in business machines. The burden to the “Affected Public” may be found below in Table 1: Annual Respondent Burden and Cost – NSPS for Surface Coating of Plastic Parts for Business Machines (40 CFR Part 60, Subpart TTT) (Renewal). The burden to the “Federal Government” is attributed entirely to work performed by either Federal employees or government contractors; this burden is found below in Table 2: Average Annual EPA Burden and Cost – NSPS for Surface Coating of Plastic Parts for Business Machines (40 CFR Part 60, Subpart TTT) (Renewal).

2. Need for and Use of the Collection

2(a) Need/Authority for the Collection

The EPA is charged under Section 111 of the Clean Air Act (CAA), as amended, to establish standards of performance for new stationary sources that reflect:

... application of the best technological system of continuous emissions reduction which (taking into consideration the cost of achieving such emissions reduction, or any non-air quality health and environmental impact and energy requirements) the Administrator determines has been adequately demonstrated.
Section 111(a)(1).

The Agency refers to this charge as selecting the best demonstrated technology (BDT). Section 111 also requires that the Administrator review and, if appropriate, revise such standards every four years.

In addition, section 114(a) states that the Administrator may require any owner/operator subject to any requirement of this Act to:

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

In the Administrator's judgment, volatile organic compound (VOC) emissions from surface coating of plastic parts cause or contribute to air pollution that may reasonably be

anticipated to endanger public health or welfare. Therefore, the NSPS were promulgated for this source category at 40 CFR part 60, subpart TTT.

2(b) Practical Utility/Users of the Data

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

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, duplication does not exist.

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 (77 FR 47631) on date. 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 affected 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's internal industry experts.

Industry trade associations and other interested parties were provided an opportunity to comment on the burden associated with the standards as they were being developed and the standards have previously been reviewed to determine the minimum information needed for compliance purposes. In developing this ICR, we contacted: 1) the Chemical Coaters Association International, at (859) 356-1030; and 2) The Society of the Plastics Industry (SPI), at (202) 974-5200.

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 industrial coating operations that apply surface coatings to plastic parts for business machines. The United States Standard Industrial Classification (SIC) codes for the respondents affected by the standards, which corresponds to the North American Industry Classification System (NAICS) codes, are listed below for this source category.

Standard (40 CFR Part 60, Subpart TTT)	SIC Codes	NAICS Codes
Paint and Coating Manufacturing	2851	32551
Electroplating, Plating, Polishing, Anodizing, and Coloring	3471	332813
Lead Pencil and Art Good Manufacturing	3579	339942
Watch, Clock, and Part Manufacturing	3579	334518
Office Machinery Manufacturing	3578, 3579	333313
Telephone Apparatus Manufacturing	3661	33421
Printed Circuit Assembly (Electronic Assembly) Manufacturing	3661	334418
Photographic and Photocopying Equipment Manufacturing	3861	333315
Photographic Film, Paper, Plate, and Chemical Manufacturing	3861	325992
Computer Storage Devices Manufacturing	3572	334112

4(b) Information Requested

(i) Data Items

In this ICR, all the data that is recorded or reported is required by NSPS for Surface Coating of Plastic Parts for Business Machines (40 CFR Part 60, Subpart TTT).

A source must make the following reports:

Notifications	
Notification of construction/reconstruction	60.7(a)(1)
Notification of actual startup	60.7(a)(3)
Initial performance test results	60.8(a)
Initial performance test	60.8(d)
Notification of physical or operational change	60.7(a)(4)

Reports	
Statement of compliance (semiannual)	60.724(b)(2)
Excess emissions/noncompliance (quarterly)	60.724(b)(1)

A source must keep the following records:

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

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

Respondent Activities	
Read instructions.	
Perform initial performance test, Reference Method 24 test, and repeat performance tests if necessary.	
Write the notifications and reports listed above.	
Enter information required to be recorded above.	

Respondent Activities
Submit the required reports developing, acquiring, installing, and utilizing technology and systems for the purpose of collecting, validating, and verifying information.
Develop, acquire, install, and utilize technology and systems for the purpose of processing and maintaining information.
Develop, acquire, install, and utilize technology and systems for the purpose of disclosing and providing information.
Adjust the existing ways to comply with any previously applicable instructions and requirements.
Train personnel to be able to respond to a collection of information.
Transmit, or otherwise disclose the information.

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.

Agency Activities
Observe initial performance tests and repeat performance tests if necessary.
Review notifications and reports, including performance test reports, and excess emissions reports, required to be submitted by industry.
Audit facility records.
Input, analyze, and maintain data in the 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. Both the 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 two years.

5(c) Small Entity Flexibility

A majority of the respondents are small entities (i.e., small businesses). The recordkeeping and reporting requirements were selected within the context of a small collection of process equipment and reflect the burden on small businesses. For the most part, smaller facilities will be using the same type of coating each month, and using the same spray application equipment. Consequently, the calculations for the monthly performance tests will be fairly repetitive and not as time-consuming as for larger sources which may use a much wider variety of coating types and application equipment of variable transfer efficiencies, etc. To the extent that larger businesses can use economies of scale to reduce their burden, the overall burden will be reduced. The Agency considers these requirements the minimum needed to ensure compliance and, therefore, cannot reduce them further for small entities.

The number of small entities potentially subject to the requirements of this information collection request is estimated to be 90 percent of the respondent universe, or 9 plants from a total of 10 respondents. This estimate is based on the percent of plants in this industry that were classified as small plants during the development of this rule.

5(d) Collection Schedule

The specific frequency for each information collection activity within this request is shown below in Table 1: Annual Respondent Burden and Cost – NSPS for Surface Coating of Plastic Parts for Business Machines (40 CFR Part 60, Subpart TTT) (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 979 (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 NSPS 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	\$121.44 (\$57.83+ 110%)
Technical	\$100.23 (\$47.73 + 110%)
Clerical	\$50.51 (\$24.05 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, March 2012, "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 only costs to the regulated industry resulting from information collection activities required by the subject standard are labor costs. There are no capital/startup or operation and maintenance costs.

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

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

6(c) Estimating Agency Burden and Cost

The only costs to the Agency are those costs associated with analysis of the reported information. 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 \$4,312.

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), 2012 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 – NSPS for Surface Coating of Plastic Parts for Business Machines (40 CFR Part 60, Subpart TTT) (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 10 existing respondents will be subject to the standard. It is estimated that no additional respondents will become subject. The overall average number of respondents, as shown in the table below is 10 per year.

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

Number of Respondents					
	Respondents That Submit Reports		Respondents That Do Not Submit Any Reports		
Year	(A) Number of New Respondents ¹	(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	10	0	0	10
2	0	10	0	0	10
3	0	10	0	0	10
Average	0	10	0	0	10

¹ 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 10.

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

Total Annual Responses				
(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	0	1	0	0
Notification of actual startup	0	1	0	0
Notification of initial performance test	0	1	0	0
Report of performance test	0	1	0	0
Quarterly report of noncompliance	2	4	0	8
Semiannual report of compliance	10	2	0	20
			Total	28

The number of Total Annual Responses is 28.

The total annual labor costs are \$94,725. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NSPS for Surface Coating of Plastic Parts for Business Machines (40 CFR Part 60, Subpart TTT) (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 respectively, and summarized below.

(i) Respondent Tally

The total annual labor hours are 979 at a cost of \$94,725. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NSPS for Surface Coating of Plastic Parts for Business Machines (40 CFR Part 60, Subpart TTT) (Renewal).

Furthermore, the annual public reporting and recordkeeping burden for this collection of information is estimated to average 35 hours per response.

There are no capital/startup or O&M costs.

(ii) The Agency Tally

The average annual Agency burden and cost over next three years is estimated to be 74 labor hours at a cost of \$4,312. See below Table 2: Average Annual EPA Burden and Cost – NSPS for Surface Coating of Plastic Parts for Business Machines (40 CFR Part 60, Subpart TTT) (Renewal).

6(f) Reasons for Change in Burden

There is an increase of one hour in the total estimated burden as currently identified in the OMB Inventory of Approved Burdens. This increase is not due to any program change. This is due to the fact that we did not round off the burden hours, as was done in the previous ICR.

There is an increase in costs for both the respondents and the Agency from the most recently approved ICR. The increase in burden cost is due to an increase in labor rates. This ICR uses updated labor rates from the Bureau of Labor Statistics to calculate burden costs.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 35 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-2012-0534. 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-2012-0534 and OMB Control Number 2060-0162 in any correspondence.

Part B of the Supporting Statement

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

Table 1: Annual Respondent Burden and Cost – NSPS for Surface Coating of Plastic Parts for Business Machines (40 CFR Part 60, Subpart TTT) (Renewal)

Burden Item	(A) Respondent Hours per Occurrence	(B) Number of Occurrences per Respondent per Year	(C) Hours per Respondent per Year (C=A x B)	(D) Number of Respondents per Year ^a	(E) Technical Hours per Year (E=C x D)	(F) Management Hours per Year (F= E x 0.05)	(G) Clerical Hours per Year (G= E x 0.1)	(H) Total Labor Costs per Year ^b
1. Applications	N/A							
2. Survey and Studies	N/A							
3. Reporting Requirements								
New sources								
a. Read instructions	0.87	1	0.87	0	0	0	0	\$0
b. Required activities								
Initial performance tests ^c	2.61	1	2.61	0	0	0	0	\$0
Demonstration of CMS	N/A							
Repeat of performance tests ^d	2.61	0.2	0.52	0	0	0	0	\$0
Method 24 testing ^{e & f}	78.26	4	313.04	0.001	0.31	0.02	0.03	\$34.86
c. Create information	-----Included in 3b-----							
d. Gather existing information	-----Included in 3e-----							
e. Write Report								
Notification of construction/ reconstruction ^g	1.74	1	1.74	0	0	0	0	\$0
Notification of actual startup ^g	1.74	1	1.74	0	0	0	0	\$0
Notification of initial performance test ^g	1.74	1	1.74	0	0	0	0	\$0
Report of performance test	5.22	1	5.22	0	0	0	0	\$0
Quarterly report of noncompliance ^h	13.91	4	55.64	2	111.28	5.56	11.13	\$12,390.98
Semiannual report of compliance ⁱ	0.43	2	0.86	10	8.6	0.43	0.86	\$957.64
<i>Subtotal for Reporting Requirements</i>						138.22		
4. Recordkeeping Requirements								
a. Read Instructions	-----Included in 3a-----							

Burden Item	(A) Respondent Hours per Occurrence	(B) Number of Occurrences per Respondent per Year	(C) Hours per Respondent per Year (C=A x B)	(D) Number of Respondents per Year ^a	(E) Technical Hours per Year (E=C x D)	(F) Management Hours per Year (F= E x 0.05)	(G) Clerical Hours per Year (G= E x 0.1)	(H) Total Labor Costs per Year ^b
b Plan Activities	-----Included in 3b-----							
c. Implement Activities	-----Included in 3b-----							
d Develop Record System	0.87	1	0.87	0	0	0	0	\$0
e. Time to Enter Information								
Record of monthly performance tests ^{i, j}	6.09	12	73.08	10	730.80	36.54	73.08	\$81,376.77
f. Train Personnel	N/A							
g Audits	N/A							
<i>Subtotal for Recordkeeping Requirements</i>						840.42		
TOTAL ANNUAL LABOR BURDEN AND COST (rounded)						979		\$94,725

Assumptions

^a We have assumed that the average number of sources that will be subject to the standard will be 10. There will be no additional new source per year that will become subject to the rule over the three-year period of this ICR

^k ^b This ICR uses the following labor rates: \$121.44 per hour for Executive, Administrative, and Managerial labor; \$100.23 per hour for Technical labor, and \$50.51 per hour for Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, March 2012 "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.

^c We have assumed that it will take each respondent 2.61 hours once per year to complete the initial performance tests.

^d We have assumed that 20 percent of respondents will have to repeat performance tests due to failure.

^e We have assumed that it will take 78.26 hours to perform a Method 24 testing. This testing is performed on the coatings used by the respondents and is generally done by the coating manufacturers, who will then provide the test result to the respondents.

^f We have assumed that 0.1 percent of respondents must generate Method 24 test data for coating usage due to modification. This situation occurs four times per year.

^g We have assumed that it will take 1.74 hours once per year to complete notification reports.

^h We have assumed that it will take 13.91 hours four times per year to write quarterly report of noncompliance.

¹ We have assumed that each respondent will take 0.43 hours two times per year to write the semiannual report of compliance.

Table 2: Average Annual EPA Burden and Cost – NSPS for Surface Coating of Plastic Parts for Business Machines (40 CFR Part 60, Subpart TTT) (Renewal)

Burden Item	(A) EPA Hours per Occurrence (Technical hours)	(B) Number of Occurrences per Plant per Year	(C) EPA Hours per Year (C=A x B)	(D) Plants per Year ^a	(E) Technical Hours per Year (E=C x D)	(F) Management Hours per Year (F= E x 0.05)	(G) Clerical Hours per Year (G= E x 0.1)	(H) Costs per Year ^b
New Plant								
Initial performance tests ^c	2.61	1	2.61	0	0	0	0	\$0
Repeat performance test ^d	2.61	0.2	0.52	0	0	0	0	\$0
Report Review								
New Plant								
Notification of construction ^e	1.74	1	1.74	0	0	0	0	\$0
Notification of initial startup ^e	1.74	1	1.74	0	0	0	0	\$0
Notification of actual startup ^e	1.74	1	1.74	0	0	0	0	\$0
Notification of initial test ^e	1.74	1	1.74	0	0	0	0	\$0
Review test results ^e	1.74	1	1.74	0	0	0	0	\$0
Quarterly reports of noncompliance ^f	6.96	4	27.84	2	55.68	2.78	5.56	\$3,734.71
Semiannual reports of compliance ^g	0.43	2	0.87	10	8.6	0.43	0.86	\$576.90
TOTAL ANNUAL BURDEN and COST (rounded)						74		\$4,312

Assumptions:

^a We have assumed that the average number of sources that will be subject to the standard will be 10. There will be no additional new source per year that will become subject to the rule over the three-year period of this ICR.

^b This ICR uses the following labor rates: Managerial \$62.27 (GS-13, Step 5, \$38.92 + 60%); Technical \$46.21 (GS-12, Step 1, \$28.88 + 60%); and Clerical \$25.01 (GS-6, Step 3, \$15.63 + 60%). These rates are from the Office of Personnel Management (OPM), 2012 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.

^c We have assumed that it will take 2.61 hours once per year to complete initial performance test.

^d We have assumed that it will take 2.61 hours 0.2 times per year to repeat performance test.

^e We have assumed that it will take 1.74 hours once per year to review notification and review test results.

^f We have assumed that 20 percent of facilities will take 6.96 hours four times per year to report noncompliance.

^g We have assumed that each facility will take 0.43 hours two times per year to report semiannual compliance.