

**SUPPORTING STATEMENT  
ENVIRONMENTAL PROTECTION AGENCY**

**NESHAP for Paints and Allied Products Manufacturing Area Source Category  
(40 CFR Part 63, Subpart CCCCCC) (Renewal)**

**1. Identification of the Information Collection**

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

NESHAP for Paints and Allied Products Manufacturing Area Source Category (40 CFR Part 63, Subpart CCCCCC) (Renewal), EPA ICR Number 2348.03, OMB Control Number 2060-0633.

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

The National Emission Standards for Hazardous Air Pollutants (NESHAP) for Paints and Allied Products Manufacturing Area Source Category (40 CFR part 63, subpart CCCCCC) were proposed on June 1, 2009, and promulgated on December 3, 2009. These regulations apply to existing or new paints and allied products manufacturing facilities that are an area source of hazardous air pollutants (HAP) emissions and that use or have the potential to emit urban air toxics (i.e., benzene; methylene chloride; and cadmium, chromium, lead, and nickel compounds). These paints and allied products manufacturing sector includes any facility primarily engaged in the production of paints, inks, adhesives, stains, varnishes, shellacs, putties, sealers, caulks, and other coatings which are intended to leave a dried film of solid material on a substrate. The affected sources consist of paint and coating manufacturing, adhesive manufacturing, printing ink manufacturing, and miscellaneous chemical product and preparation manufacturing (writing and stamp inks) facilities. New facilities include those that commenced construction, modification, or reconstruction after the date of proposal. This information is being collected to assure compliance with 40 CFR part 63, subpart CCCCCC.

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 2,190 respondents per year will be subject to the standards, and no additional respondents per year will become subject to the standards.

The Office of Management and Budget (OMB) approved the currently active ICR

without any “Terms of Clearance.”

The burden to the “Affected Public” may be found below in Table 1: Annual Respondent Burden and Cost – NESHAP for Paints and Allied Products Manufacturing Area Source Category (40 CFR Part 63, Subpart CCCCCC) (Renewal). The burden to the “Federal Government” burden is attributed entirely to work performed by either other Federal employees or government contractors and refers below to Table 2: Average Annual EPA Burden and Cost – NESHAP for Paints and Allied Products Manufacturing Area Source Category (40 CFR Part 63, Subpart CCCCCC) (Renewal).

## **2. Need for and Use of the Collection**

### **2(a) Need/Authority for the Collection**

The EPA is charged under Section 112 of the Clean Air Act, as amended, to establish standards of performance for each category or subcategory of major sources and area sources of hazardous air pollutants. 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, urban air toxics emissions from paints and allied products manufacturing facilities cause or contribute to air pollution that may reasonably be anticipated to endanger public health or welfare. Therefore, the NESHAP were promulgated for this source category at 40 CFR part 63, subpart CCCCCC.

### **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 the standard are being met. The performance test may also be observed.

The required annual 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 CCCCCC.

#### **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 August 9, 2012. 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.

Consultations with industry representatives (i.e., respondents) were conducted to determine if there is any way for EPA to reduce the recordkeeping and reporting burden or

improve the language in the standard to make it easier to comply. In developing this ICR, the EPA contacted: 1) the National Paint and Coating Association, at (863)-534-7160; and 2) the Adhesive and Sealant Council, at (202) 256-9986.

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 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 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 paints and allied products manufacturing facilities. The United States Standard Industrial Classification (SIC) codes and associated North American Industry Classification System (NAICS) codes for the respondents affected by the standards are listed in the following table.

<b>Standard (40 CFR Part 63, Subpart CCCCCC)</b>	<b>SIC Codes</b>	<b>NAICS Codes</b>
Paint and Coating Manufacturing	2851, 2899	325510
Adhesive Manufacturing	2891	325520
Printing Ink Manufacturing	2893	325910
Miscellaneous Chemical Product and Preparation Manufacturing – Writing and Stamp Inks	2819, 2899, 3952, 3999	325998

##### 4(b) Information Requested

###### (i) Data Items

In this ICR, all the data that is recorded or reported is required by the NESHAP for Paints and Allied Products Manufacturing Area Source Category (40 CFR Part 63, Subpart CCCCCC).

A source must make the following reports:

<b>Notifications</b>	
Notification of applicability	63.11603(a)(1), 63.9(a)(2)
Notification of construction/reconstruction	63.9(b)(5)
Notification of special compliance requirements	63.9(d)
Notification of performance test	63.9(e)
Notification of opacity/VE observations	63.9(f)
Additional CMS notifications	63.9(g)
Notification of compliance status	63.11603(a)(2),

<b>Notifications</b>	
	63.9(h)
Notification of changes in information	63.9(j)

<b>Reports</b>	
Reports of exceedances	63. 11603 (b)(3)
Initial/repeat performance tests	63.7(e)(1), 63.6(h)(7)
Quality assurance test plan	63.7(c)
CMS performance evaluation/report	63.8(e)(5)
SSM reports	63.6(e)(3)
Excess emissions reports	63.10(e)(3)
Annual compliance certifications	63. 11603 (b)
Performance test plan	63.7(c)(2)
CMS quality control plan	63.8(d)
CMS performance evaluation test plan	63.8(e)(3)

A source must keep the following records:

<b>Recordkeeping</b>	
Records of notifications	63. 11603 (c)(1), 63.10
Records that demonstrate continuous compliance	63. 11603 (c)(2), 63.10
Monitoring/inspection information	63. 11603 (c)(3), 63.10

### 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 particulate matter control device.
Perform initial performance 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>
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 annual 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**

All existing respondents subject to this standard are small entities (i.e., small 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. Our analysis indicates that the standard would not impose a significant adverse impact on any entities, large or small, since the average burden costs are less than 0.3 percent of revenue. 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 in Table 1 below: Annual Respondent Burden and Cost – NESHAP for Paints and Allied Products Manufacturing Area Source Category (40 CFR Part 63, Subpart CCCCCC) (Renewal).

## **6. Estimating the Burden and Cost of the Collection**

Table 1 documents the computation of individual burdens for the recordkeeping and reporting requirements applicable to the industry for the subpart included in this ICR. The individual burdens are expressed under standardized headings believed to be consistent with the concept of burden under the Paperwork Reduction Act. Where appropriate, specific tasks and major assumptions have been identified. Responses to this information collection are mandatory.

The Agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB Control Number.

### **6(a) Estimating Respondent Burden**

The average annual burden to industry over the next three years from these recordkeeping and reporting requirements is estimated to be 4,533 hours (Total Labor Hours from Table 1). These hours are based on Agency studies and background documents from the development of the regulation, Agency knowledge and experience with the NESHAP program, the previously approved ICR, and any comments received.

### **6(b) Estimating Respondent Costs**

#### **(i) Estimating Labor Costs**

This ICR uses the following labor rates:

Managerial	\$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 \$45,398.

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 – NESHAP for Paints and Allied Products Manufacturing Area Source Category (40 CFR Part 63, Subpart CCCCCC) (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 2,190 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 2,190 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>					
Year	(A) Number of New Respondents <sup>1</sup>	(B) Number of Existing Respondents <sup>1</sup>	(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	219	1,971	0	2,190
2	0	219	1,971	0	2,190
3	0	219	1,971	0	2,190
Average					2,190

<sup>1</sup> New respondent include sources with constructed, reconstructed and modified affected facilities. In this standard, existing respondents do not submit annual compliance certification and exceedance reports unless a deviation from the requirements of this subpart has occurred. We estimate that 10 percent of facilities will experience deviations.

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 2,190.

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 <sup>1</sup>	(D) Number of Existing Respondents That Keep Records But Do Not Submit Reports	(E) Total Annual Responses E=(BxC)+D
Annual Compliance Certification Report	219	1	1,971	2,190
Report of Exceedances	219	1	1,971	2,190
			Total	4,380

<sup>1</sup> In this standard, existing respondents do not submit annual compliance certification and exceedance reports unless a deviation from the requirements of this subpart has occurred. We estimate that 10 percent of facilities will experience deviations.

The number of Total Annual Responses is 4,380.

The total annual labor costs are \$1,172,604. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NESHAP for Paints and Allied Products Manufacturing Area Source Category (40 CFR Part 63, Subpart CCCCCC) (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 4,533 hours at the cost of \$1,172,604. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NESHAP for Paints and Allied Products Manufacturing Area Source Category (40 CFR Part 63, Subpart CCCCCC) (Renewal).

Furthermore, the annual public reporting and recordkeeping burden for this collection of information is estimated to average 1 hour per response.

There are no capital/startup or O&M costs to the regulated entities. 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 1,007 labor hours at a cost of \$45,398. See Table 2 below: Average Annual EPA Burden and Cost – NESHAP for Paints and Allied Products Manufacturing Area Source Category (40 CFR Part 63, Subpart CCCCCC) (Renewal).

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

There is an adjustment increase in the total estimated burden costs for the respondents as currently identified in the OMB Inventory of Approved Burdens. This increase is not due to any program changes. The increase reflects an adjustment in labor rates. This ICR uses updated labor rates from the Bureau of Labor Statistics to calculate all labor costs.

However, there is an adjustment decrease in the total burden hours and Agency costs from the previous ICR. The change in the burden and cost estimates occurred because the standard has been in effect for more than three years and the requirements are different during initial compliance (new facilities) as compared to on-going compliance (existing facilities). The previous ICR reflected those burdens and costs associated with the initial activities for subject facilities. This includes conducting performance tests, notifying initial compliance status, and establishing recordkeeping systems. This ICR, by in large, reflects only the on-going burden and costs for existing facilities. Activities for existing sources include continuously monitoring of pollutants and the submission of annual reports. Specifically, this ICR includes the burdens associated with annual compliance certification and exceedance reports. Respondents must submit these reports to the Agency only if a deviation from the requirements of this subpart has occurred. This ICR assumes ten percent of respondents will submit these reports annually for Agency review. These changes result in a net decrease in the respondent

and Agency burden hours, as well as a decrease in Agency labor costs.

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

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 1 hour 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-2012-0527. 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-2012-0527 and OMB Control Number 2060-0633 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 Paints and Allied Products Manufacturing Area Source Category (40 CFR Part 63, Subpart CCCCCC) (Renewal)**

Burden Item	A	B	C	D	E	F	G	H
	Hours per occurrence	No. of occurrences per respondent per year	Hours per respondent per year (C = A x B)	Respondents per year <sup>a</sup>	Technical hours per year (E = C x D)	Management hours per year (F = E x 0.05)	Clerical hours per year (G = E x 0.10)	Total costs per year (\$) <sup>b</sup>
1. Applications	N/A							
2. Survey and studies	N/A							
3. Acquisition, installation, and utilization of technical systems	N/A							
4. Reporting requirements								
A. Read instructions <sup>c</sup>	2	1	2	0	0	0	0	\$0
B. Required activities								
Initial notification	1	1	1	0	0	0	0	\$0
Notification of compliance status <sup>c</sup>	1	1	1	0	0	0	0	\$0
Annual compliance certification <sup>d</sup>	1	1	1	219	219	10.95	21.9	\$24,386.31
Report of exceedances <sup>d</sup>	2	1	2	219	438	21.9	43.8	\$48,772.61
C. Create information	See 4B							
D. Gather existing information	See 4B							
E. Write report	See 4B							
<b>Subtotal for Reporting Requirements</b>						<b>755.55</b>		
5. Recordkeeping requirements								
A. Read instructions	See 4A							
B. Plan activities	See 5E							
C. Implement activities	See 5E							
D. Develop record system	See 5E							

Burden Item	A	B	C	D	E	F	G	H
	Hours per occurrence	No. of occurrences per respondent per year	Hours per respondent per year (C = A x B)	Respondents per year <sup>a</sup>	Technical hours per year (E = C x D)	Management hours per year (F = E x 0.05)	Clerical hours per year (G = E x 0.10)	Total costs per year (\$) <sup>b</sup>
E. Time to enter information								
Records of all information required by standards	0.25	1	0.25	2,190	547.5	27.38	54.75	\$60,965.77
F. Time to perform VE observation	1	1	1	2,190	2,190	109.5	219	\$977,513.07
G. Time to adjust existing ways to comply with previous applicable regulations	N/A							
H. Time to transmit or disclose information	0.25	1	0.25	2,190	547.5	27.38	54.75	\$60,965.77
I. Time for audits	N/A							
<b>Subtotal for Recordkeeping Requirements</b>						<b>3,777.76</b>		
<b>TOTAL ANNUAL BURDEN (rounded)</b>						<b>4,533</b>		<b>\$1,172,604</b>

**Assumptions:**

- <sup>a</sup>. We have assumed that there are 2,190 existing facilities that are subject to the rule, and that no new major sources per year will become subject over the 3 year-period of this ICR.
- <sup>b</sup>. This ICR uses the following labor rates: Technical \$100.23 (\$47.73 + 110%); Managerial \$121.44 (\$57.83+ 110%); and 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. This ICR assumes that Managerial hours are 5 percent of Technical hours, and Clerical hours are 10 percent of Technical hours.
- <sup>c</sup>. This burden item applies to new facilities only. No new facilities are expected over the three-year period of this ICR.
- <sup>d</sup>. This report does not need to be submitted unless a deviation from the requirements of this subpart has occurred. We estimate that 10 percent of facilities will experience deviations.

**Table 2: Average Annual EPA Burden and Cost – NESHAP for Paints and Allied Products Manufacturing Area Source Category (40 CFR Part 63, Subpart CCCCCC) (Renewal)**

Burden Item	A	B	C	D	E	F	G	H
	EPA Hours per occurrence	No. of occurrences per plant per year	EPA hours per plant per year	Plants per year <sup>a</sup>	EPA technical hours per year	EPA managerial hours per year	EPA clerical hours per year	Total cost per year <sup>b</sup> (\$)
			(C = A x B)		(E = C x D)	(F = E x 0.05)	(G = E x 0.10)	
Report review								
Initial notification <sup>c</sup>	1	1	1	0	0	0	0	\$0
Notification of compliance status <sup>c</sup>	2	1	2	0	0	0	0	\$0
Annual compliance certification <sup>d</sup>	2	1	2	219	438	21.9	43.8	\$22,699.13
Report of exceedance <sup>d</sup>	2	1	2	219	438	21.9	43.8	\$22,699.13
<b>TOTAL ANNUAL BURDEN (rounded)</b>						<b>1,007</b>		<b>\$45,398</b>

<sup>a</sup>. We have assumed that there are 2,190 existing facilities that are subject to the rule, and that no new major sources per year will become subject over the 3 year-period of this ICR.

<sup>b</sup>. This cost is based on the average hourly labor rate as follows: Technical \$46.21 (GS-12, Step 1, \$28.88 + 60%); Managerial \$62.27 (GS-13, Step 5, \$38.92 + 60%); and Clerical \$25.01 (GS-6, Step 3, \$15.63 + 60%). This ICR assumes that Managerial hours are 5 percent of Technical hours, and Clerical hours are 10 percent of Technical hours. These rates are from the 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.

<sup>c</sup>. This burden item applies to new facilities only. No new facilities are expected over the three-year period of this ICR.

<sup>d</sup>. This report does not need to be submitted unless a deviation from the requirements of this subpart has occurred. We estimate that 10 percent of facilities will experience deviations.