

**SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY**

NSPS for Automobile and Light Duty Truck Surface Coating Operations (40 CFR Part 60, Subpart MM) (Renewal)

1. Identification of the Information Collection

1(a) Title of the Information Collection

NSPS for Automobile and Light Duty Truck Surface Coating Operations (40 CFR Part 60, Subpart MM) (Renewal), EPA ICR Number 1064.17, OMB Control Number 2060-0034

1(b) Short Characterization/Abstract

The New Source Performance Standards (NSPS) for Automobile and Light Duty Truck Surface Coating Operations were proposed on October 5, 1979, promulgated on December 24, 1980 (45 FR 85415), and most recently amended on October 17, 2000 (65 FR 61760). These regulations apply to the following automobile and light duty truck assembly plant operations: each prime coat operation, guide coat operation, and top coat operation commencing construction, modification or reconstruction after October 5, 1979. This information is being collected to assure compliance with 40 CFR part 60, subpart MM.

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.

Over the next three years, an average of 58 respondents per year will be subject to the standard, and 2 additional respondents per year will become subject to the standard.

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 – NSPS for Automobile and Light Duty Truck Surface Coating Operations (40 CFR Part 60, Subpart MM) (Renewal). The Federal Government “burden” is attributed entirely to work performed by either Federal employees or government contractors, and may be found below in Table 2: Average Annual EPA Burden and Cost – NSPS for Automobile and Light

Duty Truck Surface Coating Operations (40 CFR Part 60, Subpart MM) (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 automobile and light duty truck coating operations 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 MM.

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. During the performance test a record of the operating parameters under which compliance was achieved may be recorded and used to determine compliance in place of a continuous emission monitor.

When thermal or catalytic incineration is performed, the owner or operator shall keep records of each three-hour period during which the incinerator temperature averaged more than 28 degrees centigrade below the temperature of the most recent performance test, and when the average temperature difference across the catalyst bed is less than 80% of the average temperature difference recorded during the most recent performance test.

The notifications required in the standard are used to inform the Agency or delegated authority when a source becomes subject to the requirements of the regulations. The reviewing authority may then inspect the source to check if the pollution control devices are properly installed and operated, leaks are being detected and repaired, and the standard is being met. The performance test may also be observed.

The required semiannual reports are used to determine periods of excess emissions, identify problems at the facility, verify operation/maintenance procedures and for compliance determinations.

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

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

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 63813) on October 17, 2012. No comments were received from the public 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 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 Mississippi Automotive Manufacturers Association, at (601) 982-9570; and 2) the Auto Alliance, at (202) 326-5500.

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. In this case, no comments were received.

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 owners and operators of plants that conduct automobile and light duty truck surface coating operations. The United States Standard Industrial Classification (SIC) codes for the respondents affected by the standards and the corresponding North American Industry Classification System (NAICS) codes are listed in the following table.

Standard (40 CFR Part 60, Subpart MM)	SIC Codes	NAICS Codes
Automobile Manufacturing	3711	336111
Light Truck and Utility Vehicle Manufacturing		336112
Motor Vehicle Body Manufacturing		336211

4(b) Information Requested

(i) Data Items

In this ICR, all the data that is recorded or reported is required by the NSPS for Automobile and Light Duty Truck Surface Coating Operations (40 CFR Part 60, Subpart MM).

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	60.8(d)
Physical or operational change.	60.7(a)(4)
Notify the Administrator 30 days in advance of any test by Reference Method 25.	60.395(d)

Reports	
Initial performance test results	60.8(a)
Report volume weighted average mass of VOC per volume of applied coatings solid in initial compliance report.	60.395(a)
Report the gas temperature upstream and downstream of catalyst bed, total mass of VOC per volume of applied coating solids, capture efficiency, destruction efficiency, and method used to determine VOC captured and sent to the control device in initial compliance report or subsequent performance test report.	60.395(a)
Monthly performance test.	60.393(b), 60.393(c)
Install, calibrate, maintain, and operate temperature monitoring device Quarterly reports of excess VOC emissions, semiannual reports if no exceedences.	60.395(b)
Reports of low incinerator temperature.	60.395(c)
Record the incinerator combustion temperature.	60.395(d)

A source must keep the following records:

Recordkeeping	
Startups, shutdowns, malfunctions, and periods where the continuous monitoring system is inoperative.	60.7(b)
Records are required to be retained for two years. Records must be	60.8

Recordkeeping	
retained at the facility.	

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.
Install, calibrate, maintain, and operate CMS for temperature.
Perform initial performance test, Reference Method 24 or Method 25 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.

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. 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

There are no small entities (i.e., small businesses) affected by this regulation. This estimate is based on the discussion on affected small entities during the development of the rule (see BID EPA-450/3-80-003a).

5(d) Collection Schedule

The specific frequency for each information collection activity within this request is shown in below Table 1: Annual Respondent Burden and Cost – NSPS for Automobile and Light Duty Truck Surface Coating Operations (40 CFR Part 60, Subpart MM) (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 175,195 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 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 type of industry costs associated with the information collection activities in the subject standard are both labor costs which are addressed elsewhere in this ICR and the costs associated with continuous monitoring. The capital/startup costs are one time costs when a facility becomes subject to the regulation. The annual operation and maintenance costs are the ongoing costs to maintain the monitors and other costs such as photocopying and postage.

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

Capital/Startup vs. Operation and Maintenance (O&M) Costs						
(A) Continuous Monitoring Device	(B) Capital/Startup Cost for One Respondent	(C) Number of New Respondents	(D) Total Capital/Startup Cost, (B X C)	(E) Annual O&M Costs for One Respondent	(F) Number of Respondents with O&M	(G) Total O&M, (E X F)
Temperature monitoring device	\$850	2	\$1,700	\$1,750	58	\$101,500

The total capital/startup costs for this ICR are \$1,700. This is the total of column D in the above table.

The total operation and maintenance (O&M) costs for this ICR are \$101,500. 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 \$103,200. These are the costs of recordkeeping.

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 \$34,438.

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 Automobile and Light Duty Truck Surface Coating Operations (40 CFR Part 60, Subpart MM) (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 58 existing respondents will be subject to the standard. It is estimated that an additional 2 respondents per year will become subject. The overall average number of respondents, as shown in the table below, is 60 per year.

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

Number of Respondents					
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	2	56	0	0	58
2	2	58	0	0	60
3	2	60	0	0	62
Average					60

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 60.

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 $E=(B \times C)+D$
Notification of construction/reconstruction	2	1	0	2
Notification of actual startup	2	1	0	2
Notification of initial performance test	2	1	0	2
VOC emission reports	58	4	0	232
Temperature reports	58	2	0	116
			Total	354

The number of Total Annual Responses is 354.

The total annual labor costs are \$16,963,868. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NSPS for Automobile and Light Duty Truck Surface Coating Operations (40 CFR Part 60, Subpart MM) (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 175,195 hours at a cost of \$16,963,868. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NSPS for Automobile and Light Duty Truck Surface Coating Operations (40 CFR Part 60, Subpart MM) (Renewal).

Furthermore, the annual public reporting and recordkeeping burden for this collection of information is estimated to average 495 hours per response.

The total annual capital/startup and O&M costs to the regulated entity are \$103,200. 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 764 labor hours at a cost of \$34,438. See Table 2 below: Average Annual EPA Burden and Cost – NSPS for Automobile and Light Duty Truck Surface Coating Operations (40 CFR Part 60, Subpart MM) (Renewal)

6(f) Reasons for Change in Burden

There is an increase in burden for both the respondents and the Agency from the most recently approved ICR. The adjustment increase is not due to any program changes; rather, it reflects an increased number of respondents subject to the standard since the last ICR. This ICR uses updated data from OTIS in estimating the respondent universe, which is consistent with the projected industry growth in the previous ICR. This ICR also uses updated labor rates in calculating all burden costs. The overall result is an increase in labor hours, labor costs, as well as total O&M costs

This ICR corrects a mathematical error in calculating the number of responses. Furthermore, we corrected the number of sources that are required to maintain continuous monitoring system (CMS) in Table 1, line item 5. This ICR assumes that all sources incur costs associated with CMS and data management systems, which is consistent with the methodology used in calculating O&M costs. These changes also contribute to an increase in the number of total responses, as well as an increase in labor hours and costs.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 495 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-2012-0654. 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-2012-0654 and OMB Control Number 2060-0034 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 Automobile and Light Duty Truck Surface Coating Operations (40 CFR Part 60, Subpart MM) (Renewal)

Burden Items	(A) Person hours per occurrence	(B) Number of occurrences per respondent per Year	(C) Person hours per respondent per Year (C=A x B)	(D) Number of respondents per Year	(E) Technical person hours per Year (E=C x D) ^e	(F) Management person hours per Year (F=E x 0.05) ^e	(G) Clerical person hours per Year (G= E x 0.1) ^e	Total Labor Costs per Year
1. Applications^a	17.4	1	17.4	2	34.8	1.74	3.48	\$3,875.08
2. Survey and studies	116.5	1	116.5	2	233	11.65	23.3	\$25,945.25
3. Reporting requirements								
A. Read instructions ^b	8.7	1	8.7	58	504.6	25.23	50.46	\$56,188.72
B. Required activities								
Initial performance test ^c	2,434.8	1	2,434.8	2	4,869.6	243.48	486.96	\$542,244.57
Demonstration of CMS	N/A							
Repeat performance test ^{c,d}	573.9	1	573.9	0.4	229.56	11.48	22.96	\$25,562.19
C. Create information	-----Included in 3b-----							
D. Gather existing information	-----Included in 3e-----							
E. Write Report								
Notification of construction/reconstruction	1.7	1	1.7	2	3.4	0.17	0.34	\$378.60
Notification of actual startup	1.7	1	1.7	2	3.4	0.17	0.34	\$378.60
Notification of initial performance test	35.7	1	35.7	2	71.4	3.57	7.14	\$7,950.60
Report of performance test	-----Included in 3b-----							
Excess emission reports								
VOC emission reports	8.7	4	34.8	58	2,018.4	100.92	201.84	\$224,754.90
Temperature reports	26.1	2	52.2	58	3,027.6	151.38	302.76	\$337,132.34
Subtotal for Reporting Requirements						12,645		\$1,224,410.86
4. Recordkeeping Requirements								
A. Read instructions	8.7	1	8.7	58	504.6	25.23	50.46	\$56,188.72
B. Plan activities	17.4	1	17.4	58	1,009.2	50.46	100.92	\$112,377.45

C. Implement activities								
Monthly performance test	1,669.6	1	1,669.6	58	96,836.8	4,841.84	9,683.68	\$10,783,068.19
D. Develop record system	4,347.8	1	4,347.8	2	8,695.6	434.78	869.56	\$968,281.15
E. Time to enter information								
Records of temperature	417.4	1	417.4	58	24,209.2	1,210.46	2,420.92	\$2,695,767.05
F. Train personnel	34.8	1	34.8	58	2,018.4	100.92	201.84	\$224,754.90
G. Audits	17.4	1	17.4	58	1,009.2	50.46	100.92	\$112,377.45
5. Equipment and analytical evaluation expense								
A. Continuous monitoring & evaluation	34.8	1	34.8	58	2,018.4	100.92	201.84	\$224,754.90
B. Routine testing and maintenance	52.2	1	52.2	58	3,027.6	151.38	302.76	\$337,132.34
C. Systems of manage data	34.8	1	34.8	58	2,018.4	100.92	201.84	\$224,754.90
Subtotal for Recordkeeping Requirements						162,550		\$15,739,457
TOTAL LABOR BURDEN AND COST (rounded)						175,195		\$16,963,868

Assumptions

- a. Number of new facilities (per year) = 2
- b. Number of existing affected facilities (per year) = 58
- c. It is assumed the EPA Reference Method 24 test performed on the coatings used by the respondents is generally done by the coatings manufacturers, who provide the test results to the respondents. It is further assumed that the coatings manufacturers routinely perform an EPA Method 24 analysis on their coatings as a quality control measure, so there will be no additional cost incurred by the coatings manufacturers.
- d. Rate of failed performance tests = 20%
- e. Technical labor rate (Bureau of Labor Statistics) = \$100.23
 Managerial Labor rate (Bureau of Labor Statistics) = \$121.44
 Clerical Labor rate (Bureau of Labor Statistics) = \$50.51

Table 2: Average Annual EPA Burden and Cost – NSPS for Automobile and Light Duty Truck Surface Coating Operations (40 CFR Part 60, Subpart MM) (Renewal)

Burden Items	(A) Person Hours per occurrence	(B) Number of occurrences per Plant per Year	(C) EPA Hours per respondents per year (C=AxB)	(D) Plant s per Year	(E) Technical hours per Year (E=CxD) _c	(F) Management Hours per Year (E x 0.05) ^c	(G) Clerical Hours per Year (Ex0.1) ^c	(H) Total Costs per Year
Initial performance test								
New Plant ^a	20.9	1.2	25.08	2	50.16	2.51	5.02	\$2,599.52
Report review								
New Plant								
Notification of construction	1.7	1	1.7	2	3.4	0.17	0.34	\$176.20
Notification of initial startup	0.4	1	0.4	2	0.8	0.04	0.08	\$41.46
Notification of actual startup	0.4	1	0.4	2	0.8	0.04	0.08	\$41.46
Notification of initial performance test ^b	0.4	1.2	0.48	2	0.96	0.05	0.10	\$49.75
Review test results ^b	7	1.2	8.4	2	16.8	0.84	1.68	\$870.65
Existing Plant								
VOC emission reports	1.7	4	6.8	58	394.4	19.72	39.44	\$20,439.58
Temperature reports	1.7	2	3.4	58	197.2	9.86	19.72	\$10,219.79
TOTAL ANNUAL BURDEN AND COST (rounded)						764		\$34,438

Assumptions

- ^{a.} Number of new plants (per year) 2
- ^{b.} Rate of failed performance tests 20%
- ^{c.} EPA technical labor rate (GS-13 Step 1 x 1.6 for overhead) \$46.21
- EPA managerial labor rate (GS-12 Step 5 x 1.6 for overhead) \$62.27
- EPA clerical labor rate (GS-6 Step 3 x 1.6 for overhead) \$25.01