

**SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY**

NSPS for Polymeric Coating of Supporting Substrates Facilities (40 CFR Part 60, Subpart VVV) (Renewal)

1. Identification of the Information Collection

1(a) Title of the Information Collection

NSPS for Polymeric Coating of Supporting Substrates Facilities (40 CFR Part 60, Subpart VVV) (Renewal), EPA ICR Number 1284.10, OMB Control Number 2060-0181.

1(b) Short Characterization/Abstract

The New Source Performance Standards (NSPS) for Polymeric Coating of Supporting Substrates Facilities (40 CFR Part 60, Subpart VVV) were proposed on April 30, 1987 and promulgated on September 11, 1989. These regulations apply to each coating operation and any on-site coating mix preparation equipment used to prepare coatings for the polymeric coating of supporting substrates at existing and new 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 60, Subpart VVV.

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 the 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 United States Environmental Protection Agency (EPA) regional office.

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

Over the next three years, an average of 58 existing respondents per year will be subject to the standard, and 1 additional respondent 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 term “Affected Public” applies to private sector businesses or other for-profits that perform polymeric coating of supporting substrates, and may be found in Table 1: Annual Respondent Burden and Cost – NSPS for Polymeric Coating of Supporting Substrates Facilities (40 CFR Part 60, Subpart VVV) (Renewal). The burden to the “Federal Government” is attributed entirely to work performed by federal employees or government contractors, and may be found in Table 2: Average Annual EPA Burden and Cost – NSPS for Polymeric Coating of Supporting Substrates Facilities (40 CFR Part 60, Subpart VVV) (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 polymeric coating of supporting substrates facilities causes or contributes 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 VVV.

2(b) Practical Utility/Users of the Data

Control of VOC emissions from polymeric coating of supporting substrates facilities requires not only the installation of properly designed equipment, but also the operation and maintenance of that equipment. VOC emissions are generated by each coating operation and associated coating mix preparation equipment used to prepare the polymeric coating. The standard relies on:

- The capture of VOC emissions by partial or total enclosure around the coating operation and by installing covers over each piece of affected mix preparation equipment (“alternative standard”);
- The reduction of VOC emissions from the coating operation and affected covered equipment to a control device (“emission reduction standard”); and
- The recovery of VOC emissions at one coating operation if the liquid material balance method is used to demonstrate compliance.

The recordkeeping and reporting requirements in the standard ensures compliance with the applicable regulations which were promulgated in accordance with the Clean Air Act. The collected information is also used for targeting inspections and as evidence in legal proceedings.

Performance tests are required in order to determine an affected facility’s initial capability to comply with the emission standard. Continuous emission monitors are used to ensure compliance with the standard at all times.

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 that the standard is being met. The performance test may also be observed.

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

3. Nonduplication, Consultations, and Other Collection Criteria

The requested recordkeeping and reporting are required under 40 CFR Part 60, Subpart VVV.

3(a) Nonduplication

If the subject standards have not been delegated, the information is sent directly to the appropriate EPA regional office. Otherwise, the information is sent directly to the delegated state or local agency. If a state or local agency has adopted its own similar standards to implement the Federal standards, a copy of the report submitted to the state or local agency can be sent to the Administrator in lieu of the report required by the Federal standards. Therefore, no duplication exists.

3(b) Public Notice Required Prior to ICR Submission to OMB

An announcement of a public comment period for the renewal of this ICR was published in the Federal Register (79 FR 30117) on May 27, 2014. No comments were received on the burden published in the Federal Register.

3(c) Consultations

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, we contacted both Cytec Engineered Materials at (507) 312-8824 and the Chemical Fabrics and Film Association at (216) 241-7333.

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.

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 (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/operators of polymeric coating of supporting substrates facilities. The United States Standard Industrial Classification (SIC) codes and corresponding North American Industry Classification System (NAICS) codes for respondents affected by the standard are listed in the following table.

Standard (40 CFR Part 60, Subpart VVV)	SIC Codes	NAICS Codes
Narrow Fabric and Other Smallwares Mills	2241	313221
Coated Fabrics, Not Rubberized	2295	31332
Tire Cord and Fabrics	2296	314992
Canvas and Related Products	2394	314912
Rubber and Plastics Hose and Belting	3052	32622
Gaskets, Packing, and Sealing Devices	3053	339991
Fabricated Rubber Products, Not Elsewhere Classified	3069	31332, 315299, 315999, 339113, 33992, 339932, 326192, and 326299

4(b) Information Requested

(i) Data Items

In this ICR, all the data that is recorded or reported is required by the NSPS for Polymeric Coating of Supporting Substrates Facilities (40 CFR Part 60, Subpart VVV).

A source must make the following notifications and reports:

Notifications	
Construction/reconstruction	60.7(a)(1)
Actual startup	60.7(a)(3)
Performance test	60.8(d)
Demonstration of continuous monitoring system performance	60.7(a)(5)
Physical or operational change	60.7(a)(4)
Projected and actual VOC use (if <130 or <95 Mg/yr)	60.747(b) and (c)

Reports	
Performance test results	60.747(a) and 60.8(a)
Quarterly reports of excess emissions or periods of noncompliance	60.747(d)(1)-(6), 60.747(e)(2), and 60.747(f)
Semiannual reports of no excess emissions/deviations from operating parameters	60.747(d)(7) and 60.747(e)(1)

A source must keep the following records:

Recordkeeping	
Maintain records of startups, shutdowns, malfunctions, or periods where the continuous monitoring system is inoperative	60.7(b)
Records for performance test measurements	60.8(c)
Record projected VOC use and actual 12-month VOC use, operating parameters (e.g., concentration level of organic compounds, periods of actual coating operations, system efficiency, average combustion temperature, gas temperature before and after the catalytic bed) of the control device (e.g., carbon absorption system, thermal incinerator, and catalytic incinerator); and other parameters, depending on the compliance method being used	60.747
Maintain records for sources with continuous monitoring systems	60.7(f)
Retain records for two years	60.747(h)

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 required monitoring devices to monitor concentration levels of organic compounds, combustion temperature, gas temperature, or other values of the chosen parameter, depending on the control device used.
Monitor projected and actual VOC use.
Perform performance tests and use the appropriate reference methods: Reference Method 24 to determine VOC content in coating or formulation data (if approved by Administrator); Reference Method 25 (or alternative Methods 18 or 25A) to determine VOC concentrations from incinerator gas streams or the efficiency of fixed-bed carbon adsorption systems; Method 1 or 1A for sample and velocity traverses; Method 2, 2A, 2C or 2D for velocity and volumetric rates; Method 3 for gas analysis; and Method 4 for stack gas moisture measurements.
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.

Respondent Activities
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 systems). 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, and note the operating conditions under which compliance was achieved. Data and records maintained by the respondents are tabulated and published for use in compliance and enforcement programs. The quarterly and 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 is a distribution of small and large business affected by the standard. However, the impact on small entities (i.e., small businesses) was taken into consideration during the development of the regulation. Any affected facility for which the amount of VOC used is less than 95 Mg per 12-month period is subject only to the requirements of Sections 60.744(b), 60.747(b) and 60.747(c) of the standard, which require reports and records of VOC use. This reduces regulatory requirements for smaller facilities.

According to EPA's *Polymeric Coating of Supporting Substrates – Background Information for Proposed Standards* (May 1985), approximately 55 percent of plants applying polymeric coatings to supporting substrates are small businesses according to employment-size criteria established by the U.S. Small Business Administration. Applying this percentage to the estimated number of respondents affected by this rule, approximately 32 respondents are small entities.

The Agency considers these to be the minimum requirements needed to ensure compliance and, therefore, cannot reduce them further for small entities. To the extent that larger businesses can use economies of scale to reduce their burden, the overall burden will be reduced.

5(d) Collection Schedule

The specific frequency for each information collection activity within this request is shown in below Table 1: Annual Respondent Burden and Cost – NSPS for Polymeric Coating of Supporting Substrates Facilities (40 CFR Part 60, Subpart VVV) (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 13,667 (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 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	\$128.02 (\$60.98 + 110%)
Technical	\$101.05 (\$48.12 + 110%)
Clerical	\$51.37 (\$24.46 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, March 2014, "Table 2. Civilian workers, by occupational and industry group." The rates are from column 1, "Total compensation." The rates have been increased by 110 percent to account for the benefit packages available to those employed by private industry.

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

The type of industry costs associated with the information collection activities in the subject standard are both labor costs, which are addressed elsewhere in this ICR, and the costs associated with continuous monitoring. The capital/startup costs are one-time costs when a facility becomes subject to the regulation. The annual operation and maintenance costs are the ongoing costs to maintain the monitor(s) 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)
VOC Monitor	\$40,000	1	\$40,000	\$8,500	58	\$493,000
Temperature Monitor	\$8,500	1	\$8,500	\$2,000	58	\$116,000
Total			\$48,500			\$609,000

The total capital/startup costs for this ICR are \$48,500. This is the total of column D in the above table.

The total operation and maintenance (O&M) costs for this ICR are \$609,000. This is the total of column G.

The average annual cost for capital/startup and operation and maintenance costs to industry over the next three years of the ICR is estimated to be \$657,500. These are recordkeeping costs.

6(c) Estimating Agency Burden and Cost

The only costs to the Agency are those costs associated with analysis of the reported information. EPA's overall compliance and enforcement program includes activities such as the examination of records maintained by the respondents, periodic inspection of sources of emissions, and the publication and distribution of collected information.

The average annual Agency cost during the three years of the ICR is estimated to be \$34,440.

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

Managerial	\$62.90 (GS-13, Step 5, \$39.31 + 60%)
Technical	\$46.67 (GS-12, Step 1, \$29.17 + 60%)
Clerical	\$25.25 (GS-6, Step 3, \$15.78 + 60%)

These rates are from the Office of Personnel Management (OPM), 2014 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 Polymeric Coating of Supporting Substrates Facilities (40 CFR Part 60, Subpart VVV) (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 one additional respondent per year will become subject. The overall average number of respondents, as shown in the table below, is 59 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	5	57	0	4	58
2	5	58	0	4	59
3	5	59	0	4	60
Average	5	58	0	4	59

¹ New respondents 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 59.

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	5	1	0	5

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 actual startup	5	1	0	5
Notification of initial performance test	5	1	0	5
Notification of VOC use at end of initial year	1	1	0	1
Report of performance test	5	1	0	5
Report of repeat performance test	1	1	0	1
Report of monitoring exceedances and non-compliance periods	12	4	0	48
Report of no excess emissions	47	2	0	94
Report when 1st projected VOC use exceeds cutoff	2	1	0	2
Report when 1st actual 12-month VOC use exceeds cutoff	0	1	0	0
Notification of changes	5	1	0	5
			Total	171

The number of Total Annual Responses is 171. Note that four respondents have been double counted in the above table because they have both existing affected facilities and new affected facilities.

The total annual labor costs are \$1,337,996. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NSPS for Polymeric Coating of Supporting Substrates Facilities (40 CFR Part 60, Subpart VVV) (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 13,667. Details regarding these estimates may be found in Table 1: Annual Respondent Burden and Cost – NSPS for Polymeric Coating of Supporting

Substrates Facilities (40 CFR Part 60, Subpart VVV) (Renewal).

Furthermore, the annual public reporting and recordkeeping burden for this collection of information is estimated to average 80 hours per response.

The total annual capital/startup and O&M costs to the regulated entity are \$657,500. 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 757 labor hours at a cost of \$34,440. See Table 2: Average Annual EPA Burden and Cost – NSPS for Polymeric Coating of Supporting Substrates Facilities (40 CFR Part 60, Subpart VVV) (Renewal).

6(f) Reasons for Change in Burden

There is an adjustment increase in the total estimated burden, capital/startup, and O&M costs as currently identified in the OMB Inventory of Approved Burdens. This increase is due to industry growth and is not due to any program changes.

There is an apparent decrease in the Agency labor burden hours due to a summation error in the most recently approved ICR. This error resulted in the overestimation of Agency burden. EPA has identified and reconciled this discrepancy during the preparation of this ICR renewal, hence the apparent burden decrease.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 80 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-2014-0043. 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) 566-1927. 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-2014-0043 and OMB Control Number 2060-0181 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 Polymeric Coating of Supporting Substrates Facilities (40 CFR Part 60, Subpart VVV) (Renewal)

Burden Item	A	B	C	D	E	F	G	H
	Technical person-hours per occurrence	No. of occurrences per respondent per year	Technical person-hours per respondent per year (AxB)	Respondents per year ^a	Technical hours per year (CxD)	Management hours per year (Ex0.05)	Clerical hours per year (Ex0.10)	Total cost per year (\$) ^b
1. Applications	N/A							
2. Surveys and studies	N/A							
3. Reporting requirements								
A. Read instructions ^c	1	1	1	5	5	0.25	0.5	562.94
B. Required activities								
Initial performance test	280	1	280	5	1,400	70	140	157,623.2
Repeat performance test ^d	280	1	280	1	280	14	28	31,524.64
Monthly compliance test ^e	90	12	1,080	1	1,080	54	108	121,595.04
C. Create information	See 3B							
D. Gather existing information	See 3E							
E. Write report								
New facilities								
Notification of construction/reconstruction	2	1	2	5	10	0.5	1	1,125.88
Notification of actual startup	2	1	2	5	10	0.5	1	1,125.88
Notification of initial performance test	2	1	2	5	10	0.5	1	1,125.88
Notification of VOC use at end of initial year ^f	2	1	2	1	2	0.1	0.2	225.18
Report of performance test	See 3B							
New and existing facilities								
Report of monitoring exceedances and non-compliance periods ^g	16	4	64	12	768	38.4	76.8	86,467.58

Burden Item	A	B	C	D	E	F	G	H
	Technical person-hours per occurrence	No. of occurrences per respondent per year	Technical person-hours per respondent per year (AxB)	Respondents per year ^a	Technical hours per year (Cx D)	Management hours per year (Ex0.05)	Clerical hours per year (Ex0.10)	Total cost per year (\$) ^b
Report of no excess emissions ^h	8	2	16	47	752	37.6	75.2	84,666.18
Report when 1st projected VOC use exceeds cutoff	2	1	2	2	4	0.2	0.4	450.35
Report when 1st actual 12-month VOC use exceeds cutoff ⁱ	2	1	2	0	0	0	0	0
Notification of changes ^c	4	1	4	5	20	1	2	2,251.76
Subtotal for Reporting Requirements						4,992.2		488,745
4. Recordkeeping requirements								
A. Read instructions	See 3A							
B. Plan activities	See 3B							
C. Implement activities	See 3B							
D. Develop record system	N/A							
E. Time to enter information								
Records of startups, shutdowns, malfunctions, etc. ^j	1.5	25	37.5	59	2,212.5	110.63	221.25	249,100.95
Records of operating parameters ^k	0.25	350	87.5	59	5,162.5	258.13	516.25	581,235.55
Records of semiannual projected VOC use estimate ^l	1	2	2	12	24	1.2	2.4	2,702.11
Records of 12-month actual VOC use ^l	1	12	12	12	144	7.2	14.4	16,212.67
F. Train personnel	N/A							
G. Audits	N/A							
Subtotal for Recordkeeping Requirements						8,674.5		849,251
TOTAL ANNUAL BURDEN AND COST (ROUNDED)						13,667		1,337,996

^a This ICR uses the following labor rates: \$101.05 (technical), \$128.02 (managerial), and \$51.37 (clerical). These rates are from the United States Department of Labor, Bureau of Labor Statistics, March 2014, "Table 2. Civilian workers, by occupational and industry group." The rates are from column 1, "Total

compensation.” They have been increased by 110 percent to account for the benefit packages available to those employed by private industry.

^b On average, EPA estimates 58 existing plants and 1 new plant per year will be subject to the NSPS over the next 3 years. EPA assumes 4 existing plants per year will install new coating lines.

^c This burden applies to new plants and existing plants that modify or reconstruct coating operations or coating mix preparation equipment. Per footnote b, EPA estimates 1 new plant per year and 4 existing plants with new coating lines per year.

^d EPA assumes 20 percent of initial performance tests must be repeated due to failure ($5 \times 20\% = 1$).

^e EPA assumes one coating line per year will demonstrate compliance by the liquid material balance method, which requires monthly compliance testing.

^f EPA assumes one plant per year will be required to submit this notification.

^g EPA assumes 20 percent of existing and new plants will report monitoring exceedances or non-compliance periods on a quarterly basis ($59 \times 20\% = 12$, after rounding). These plants will comply through either the emission reduction, alternative, or coating mix preparation equipment standards.

^h EPA assumes 80 percent of existing and new plants will report no excess emissions ($59 \times 80\% = 47$, after rounding).

ⁱ EPA does not expect coating lines at any existing or new plants to exceed the cutoff value.

^j EPA assumes there will be one malfunction or shutdown every 2 weeks over 50 weeks per year, or 25 occurrences per year ($50/2 = 25$).

^k EPA assumes operating parameters will be recorded over 350 days per year.

^l EPA assumes 20 percent of existing and new plants will record VOC use estimates ($59 \times 20\% = 12$, after rounding).

Table 2: Average Annual EPA Burden and Cost – NSPS for Polymeric Coating of Supporting Substrates Facilities (40 CFR Part 60, Subpart VVV) (Renewal)

Burden Item	A	B	C	D	E	F	G	H
	Technical person-hours per occurrence	No. of occurrences per respondent per year	Technical person-hours per respondent per year (AxB)	Respondents per year ^a	Technical hours per year (Cx D)	Management hours per year (Ex0.05)	Clerical hours per year (Ex0.10)	Total cost per year (\$) ^b
New facilities								
Notification of construction/reconstruction	2	1	2	5	10	0.5	1	523.4
Notification of actual startup	2	1	2	5	10	0.5	1	523.4
Notification of initial performance test	2	1	2	5	10	0.5	1	523.4
Notification of VOC use at end of initial year	2	1	2	1	2	0.1	0.2	104.68
Performance test results	8	1	8	5	40	2	4	2,093.6
New and existing facilities								
Report of monitoring exceedances and non-compliance periods	8	4	32	12	384	19.2	38.4	20,098.56
Report of no excess emissions	2	2	4	47	188	9.4	18.8	9,839.92
Report when 1st projected VOC use exceeds cutoff	2	1	2	2	4	0.2	0.4	209.36
Report when 1st actual 12-month VOC use exceeds cutoff	2	1	2	0	0	0	0	0
Notification of changes	2	1	2	5	10	0.5	1	523.4
TOTAL ANNUAL BURDEN AND COST (ROUNDED)						757		34,440

^a On average, EPA estimates 58 existing plants and 1 new plant per year will be subject to the NSPS over the next 3 years. EPA assumes 4 existing plants per year will install new coating lines.

^b This ICR uses the following labor rates: \$46.67 (technical), \$62.90 (managerial), and \$25.25 (clerical). These rates are from the Office of Personnel Management (OPM), 2014 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.