

**SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY**

**NESHAP for Metal Coil Surface Coating Plants (40 CFR Part 63, Subpart SSSS)
(Renewal)**

1. Identification of the Information Collection

1(a) Title of the Information Collection

NESHAP for Metal Coil Surface Coating Plants (Renewal), EPA ICR Number 1957.07, OMB Control Number 2060-0487.

1(b) Short Characterization/Abstract

The National Emission Standards for Hazardous Air Pollutants (NESHAP) for Metal Coil Surface Coating Plants (40 CFR Part 63, Subpart SSSS) were proposed on July 18, 2000, promulgated on June 10, 2002, and amended on March 17, 2003. These regulations apply to existing facilities and new facilities that are major sources of hazardous air pollutant (HAP) at which a coil coating line is operated. Coil coating line is a process in which special equipment is used to apply an organic coating to the surface of metal coils. The provisions of this Subpart do not apply to coil coating lines that are part of research or laboratory equipment or coil coating lines on which at least 85 percent of the metal coil coated, based on surface area, is less than 0.15 millimeters (0.006 inches) thick, unless the coating line is controlled by a common control device. Existing facilities include those that commenced construction on or before the date of proposal. New facilities include those that commenced construction or reconstruction after the date of proposal. This information is being collected to assure compliance with 40 CFR Part 63, Subpart SSSS.

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.

Over the next three years, an average of 89 respondents per year will be subject to the standard, and no additional respondents per years will become subject to the standard. Respondents will also 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 United States Environmental Protection Agency (EPA) regional office.

Based on our consultations with industry representatives, there is an average of one affected facilities at each plant site and that each plant site has only one respondent (i.e., the owner/operator of the plant site). Thirteen of the 89 sources are considered synthetic minors and

are not subject to the emission limits in the standard. 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.

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

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, HAP emissions from metal coil surface coating plants cause or contribute to air pollution that may reasonably be anticipated to endanger public health or welfare. Therefore, the NESHAP was promulgated for this source category at 40 CFR Part 63, Subpart SSSS.

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.

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. Nonduplication, Consultations, and Other Collection Criteria

The requested recordkeeping and reporting are required under 40 CFR Part 63, Subpart SSSS.

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

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 association and other interested parties were provided an opportunity to comment on the burden associated with the standard as it was being developed. In developing

this ICR, we contacted both the National Coil Coating Association at (216) 241-7333 and Aleris at (216) 910-3400. We received a comment from Aleris on the cost associated with maintaining continuous temperature measuring monitors and the time required to gather information for semiannual reporting. We have updated our O&M and respondent burden cost estimates based on the comment 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 (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 metal coil surface coating plants. The United States Standard Industrial Classification (SIC) code for the respondents affected by the standards, and the corresponding North American Industry Classification System (NAICS) codes are listed below for this source category.

Standard (40 CFR Part 63, Subpart SSSS)	SIC Codes	NAICS Codes
Metal Coating, Engraving (except Jewelry and Silverware), and Allied Services to Manufacturers	3479	332812
Gasket, Packing, and Sealing Device Manufacturing	3053	339991
Electrometallurgical Ferroalloy Product Manufacturing	3313	331112
Steel Works, Blast Furnaces (Including Coke Ovens), and Rolling Mills (hot-rolling purchased steel)	3312	331221
Cold-Rolled Steel Sheet, Strip, and Bars	3316	331221
Iron and Steel Pipe and Tube Manufacturing from Purchased Steel	3317	331210
Primary Aluminum Production	3334	331312
Secondary Smelting and Alloying of Aluminum	3341	331314
Aluminum Sheet, Plate, and Foil Manufacturing	3353	331315
Fabricated Structural Metal Manufacturing	3441	332312
Sheet Metal Work Manufacturing	3444	332322
Prefabricated Metal Building and Component Manufacturing	3448	332311
Motor Vehicle Metal Stamping	3465	336370
Electroplating, Plating, Polishing, Anodizing and Coloring	3471	332813
All other Miscellaneous Fabricated Metal Product Manufacturing	3499	332999
Printing Machinery and Equipment Manufacturing	3555	333293
All other Motor Vehicle Parts Manufacturing	3714	336399
Photographic Film, Paper, Plate, and Chemical Manufacturing	3861	325992

4(b) Information Requested

(i) Data Items

In this ICR, all the data that is recorded or reported is required by the NESHAP for Metal Coil Surface Coating Plants (Renewal).

A source must make the following reports:

Notifications	
Notification and application of construction or reconstruction	63.5180(b)(1), 63.9(b)(1)-(3)
Notification of anticipated date of initial startup	63.5180(b)(2), 63.9(b)(4)
Notification to commence construction	63.5180(b)(2), 63.9(b)(4)
Notification of actual startup	63.5180(b)(2), 63.9(b)(4)
Notification of intent to construct/reconstruct	63.5180(b)(2), 63.9(b)(4)-(5)
Notification of performance tests	63.5180(c), 63.9(e)-(g)
Notification of compliance status	63.5180(d), 63.9(h)

Reports	
Report of initial performance test	63.5180(e), 63.10(d)(2)
Reports of startup, shutdown, and malfunction plan	63.5180(f), 63.6(e)(3), 63.9(d)(5)
Semiannual compliance report of no deviation	63.5180(g), 63.10(e)(5)
Semiannual compliance report of deviation	63.5180(h)(i), 63.10(e)(5)

A source must keep the following records:

Recordkeeping	
Maintain records of all reports	63.5190(a)(1)-(3), 63.10(b)(2)
Maintain records of startup, shutdown, or malfunction plan	63.5180(f), 63.10(b)(2)
Maintain documentation of corrective action procedures	63.5180(f), 63.10(b)(2)

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 35 percent of the respondents use electronic reporting.

(ii) Respondent Activities

Respondent Activities
Read instructions.
Install, calibrate, maintain, and operate a coil coating line at their metal coil surface coating plants.
Perform initial performance test, Reference Methods 1, 1A, 2, 2A, 2C, 2D, 2F, 2G, 3, 3A, 3B, 4, 25, and 25A tests, 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
Review notifications and reports, including performance test reports, and excess emissions

Agency Activities
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 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 five years.

5(c) Small Entity Flexibility

The majority of the respondents are large entities (i.e., large businesses). However, the impact on small entities (i.e., small businesses) was taken into consideration during the development of the regulation. Due to technical considerations involving the process operations and the types of control equipment employed, the recordkeeping and reporting requirements are the same for both small and large entities. The Agency considers these 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 – NESHAP for Metal Coil Surface Coating Plants (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 25,145 (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	\$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 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 ¹	(G) Total O&M, (E X F)
Continuous monitoring system	N/A	N/A	\$0	\$1,200	76	\$91,200

¹ There is an average of eighty-nine sources. Thirteen of these sources are considered synthetic minors and not subject to the emission limits in the standard

² According to industry consultation comment received, the O&M cost to maintain continuous temperature measuring monitor is \$1,200 per respondent. The cost covers replacement of temperature sensor each calendar year.

The total capital/startup costs for this ICR are zero. This is the total of column D in the above table.

The total operation and maintenance (O&M) costs for this ICR are \$91,200. 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 \$91,200. 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 \$22,276.

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 – NESHAP for Metal Coil Surface Coating Plants (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 89 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 89 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 ²	(E) Number of Respondents (E=A+B+C-D)
1	0	89	0	0	89
2	0	89	0	0	89
3	0	89	0	0	89
Average	0	89	0	0	89

¹ New respondents include sources with constructed and reconstructed affected facilities.

² 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 89.

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
Initial notification	0	1	0	0
Notification of construction/reconstruction	0	1	0	0
Notification of anticipated startup	0	1	0	0
Notification of actual startup	0	1	0	0
Notification of compliance status	0	1	0	0
Performance test notification	0	0.11	0	0
Performance test report	0	0.11	0	0
Semiannual report of exceedances	7.6	2	0	15.2
Semiannual report of no exceedances	68.4	2	0	136.8
Startup, shutdown, malfunction report	7.6	2	0	15.2
			Total	167

The number of Total Annual Responses is 167.

The total annual labor costs are \$2,461,759. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NESHP for Metal Coil Surface Coating Plants (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 below, respectively, and summarized below.

(i) Respondent Tally

The total annual labor hours are 25,145. Details regarding these estimates may be found in Table 1. Annual Respondent Burden and Cost – NESHP for Metal Coil Surface Coating Plants (Renewal).

Furthermore, the annual public reporting and recordkeeping burden for this collection of information is estimated to average 151 hours per response.

The total annual capital/startup and O&M costs to the regulated entity are \$91,200. 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 489 labor hours at a cost of \$22,276. See Table 2: Average Annual EPA Burden and Cost – NESHP for Metal Coil Surface Coating Plants (Renewal).

6(f) Reasons for Change in Burden

There is an increase in the respondent burden hours and O&M costs. This increase occurred because we have adjusted the burden estimates based on industry comment received from consultation during the renewal of this ICR. The comment provided specific estimates for the costs to maintain continuous temperature measuring monitors and the time required for facilities to gather information for semiannual reporting. There is also an adjustment increase in the respondent and Agency labor costs from using more updated labor rates available from the Bureau of Labor Statistics.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 151 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-2014-0078. 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-2014-0078 and OMB Control Number 2060-0487 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 Metal Coil Surface Coating Plants (Renewal)

Burden item	(A) Person hours per occurrence	(B) No. of occurrences per respondent per year	(C) Person hours per respondent per year (C=AxB)	(D) Respondents per year ^a	(E) Technical person- hours per year (E=CxD)	(F) Management person hours per year (Ex0.05)	(G) Clerical person hours per year (Ex0.1)	(H) Total Cost Per year ^b
1. Applications	N/A							
2. Survey and Studies	N/A							
3. Reporting requirements								
A. Read instructions	4	1	4	0	0	0	0	\$0
B. Required activities								
Initial oxidizer performance test ^c	280	0.11	30.8	0	0	0	0	\$0
Repeat oxidizer performance test ^c	280	0.11	30.8	0	0	0	0	\$0
Initial capture performance test ^c	215	0.11	23.65	0	0	0	0	\$0
Repeat capture performance test ^c	215	0.11	23.65	0	0	0	0	\$0
Emission rate limit compliance determination	16	12	192	0	0	0	0	\$0
Startup, shutdown, malfunction plan	32	1	32	0	0	0	0	\$0
C. Create information	See 4B							
D. Gather existing information ^k	60	1	60	76	4,560	228	456	\$513,401.28
E. Write Report								
Initial Notification	2	1	2	0	0	0	0	\$0
Notification of construction/reconstruction	2	1	2	0	0	0	0	\$0
Notification of anticipated startup	2	1	2	0	0	0	0	\$0
Notification of actual startup	2	1	2	0	0	0	0	\$0
Notification of compliance status	4	1	4	0	0	0	0	\$0
Performance test notification ^c	2	0.11	0.22	0	0	0	0	\$0
Performance test report ^c	40	0.11	4.4	0	0	0	0	\$0
Semiannual reports of exceedances ^{d,c}	16	2	32	7.6	243.2	12.16	24.32	\$27,381.40
Semiannual report of no	8	2	16	68.4	1094.4	54.72	109.44	\$123,216.31

Burden item	(A) Person hours per occurrence	(B) No. of occurrences per respondent per year	(C) Person hours per respondent per year (C=AxB)	(D) Respondents per year ^a	(E) Technical person- hours per year (E=CxD)	(F) Management person hours per year (Ex0.05)	(G) Clerical person hours per year (Ex0.1)	(H) Total Cost Per year ^b
exceedances ^{f,g}								
Startup, shutdown, malfunction report ^h	8	2	16	7.6	121.6	6.08	12.16	\$13,690.70
Subtotal for Reporting Requirements					6,922			\$677,689.69
4. Recordkeeping requirements								
A. Read instructions	See 4B							
B. Plan activities	N/A							
C. Implement activities	N/A							
D. Develop record system	N/A							
E. Time to enter information								
Records of all information required by standards ⁱ	4	52	208	76	15,808	790.4	1580.8	\$1,779,791.10
F. Time to train personnel	N/A							
G. Time to adjust existing ways to comply with previously applicable requirements	N/A							
H. Time to transmit or disclose information ^j	0.25	2	0.5	76	38	1.9	3.8	\$4,278.34
I. Time for audits	N/A							
Subtotal for Recordkeeping Requirements					18,223			\$1,784,069.45
TOTAL LABOR BURDEN AND COST (rounded)					25,145			\$2,461,759

Assumptions:

^a We have assumed that there are approximately eighty-nine respondents, with no additional new or reconstructed sources becoming subject to the rule over the next three years. Within those eighty-nine existing sources, only seventy-six are subject to the emission limits in the standard. The remaining thirteen respondents are permitted as synthetic minors and, therefore, are not subject to the emission limits in the standard.

^b This ICR uses the following labor rates: \$128.02 per hour for Executive, Administrative, and Managerial labor; \$101.05 per hour for Technical labor, and \$51.37 per hour for Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, September 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.

^c This is a one-time startup costs associated with initial compliance determination and acquisition, installation, and utilization of technology and systems needed to support recordkeeping and reporting. The one-time startup costs are amortized over the 15-year life of control equipment at 7 percent interest. For computational purposes, the number of occurrences per respondent per year is amortized over 15 years.

^d We have assumed that exceedances are reported semiannually.

^e We have assumed that 10 percent of respondents will report exceedances.

^f Reports indicating no exceedances are required semiannually.

^g We have assumed that 90 percent of respondents will report no exceedances.

^h We have assumed that 10 percent of respondents will file a startup, shutdown, malfunction report semiannually.

ⁱ We have assumed that all information is entered on a weekly basis.

^j We have assumed that each of the 76 respondents will take 15 minutes to transmit or disclose information twice a year.

^k Based on comment we received from industry consultation, 60 hours per respondent is required to gather and evaluate information in preparation of semiannual reports.

Table 2: Average Annual EPA Burden and Cost – NESHAP for Metal Coil Surface Coating Plants (Renewal)

Activity	(A) EPA person- hours per occurrence	(B) No. of occurrences per plant per year	(C) EPA person- hours per plant per year (C=AxB)	(D) Plants per year ^a	(E) Technical person- hours per year (E=CxD)	(F) Management person-hours per year (Ex0.05)	(G) Clerical person- hours per year (Ex0.1)	(H) Cost, \$ ^b
Initial performance test	495	1	495	0	0	0	0	\$0
Repeat performance test – re-testing preparation	4	1	4	0	0	0	0	\$0
Repeat performance – re-testing	495	1	495	0	0	0	0	\$0
Excess emissions enforcement ctivities	120	1	120	0	0	0	0	\$0
Review reports								
Notification of applicability	2	1	2	0	0	0	0	\$0
Notification of construction/reconstruction	2	1	2	0	0	0	0	\$0
Notification of anticipated startup	2	1	2	0	0	0	0	\$0
Notification of actual startup	2	1	2	0	0	0	0	\$0
Notification of special compliance requirements	N/A							
Notification of compliance status	2	1	2	0	0	0	0	\$0
Review of initial performance test report	8	1	8	0	0	0	0	\$0
Review of repeat performance test report	8	1	8	0	0	0	0	\$0
Semiannual report of excess emissions ^{c,d}	8	2	16	7.6	121.6	6.08	12.16	\$6,364.54
Semiannual report of no excess emissions ^{e,f}	2	2	4	68.4	273.6	13.68	27.36	\$14,320.22
Review of NESHAP waiver application	N/A							
Review startup, shutdown, malfunction report ^g	2	2	4	7.6	30.4	1.52	3.04	\$1,591.14
TOTAL ANNUAL BURDEN AND COST (rounded)					489			\$22,276

Assumptions:

^a We have assumed that there are approximately eighty-nine respondents, with no additional new or reconstructed sources becoming subject to the rule over the next three years. Within those eighty-nine existing sources, only seventy-six are subject to the emission limits in the standard. The remaining thirteen respondents are permitted as synthetic minors and, therefore, are not subject to the emission limits in the standard.

^b This cost is based on the following hourly labor rates increased by 60 percent to account for the benefit packages available to government employees: \$62.90 for Managerial (GS-13, Step 5, \$39.31 + 60%), \$46.67 for Technical (GS-12, Step 1, \$29.17 + 60%) and \$25.25 Clerical (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.

^c It is assumed that 10 percent of respondents will report excess emissions.

^d It is assumed that reports of excess emissions are required semiannually.

^e We have assumed that 90 percent of respondents will report no excess emissions.

^f It is assumed that reports of no excess emissions are required semiannually.

^g We have assumed that 10 percent of respondents will submit startup, shutdown, malfunction reports to be reviewed.