

**SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY**

1 NESHAP for the Wood Building Products Surface Coating Industry (40 CFR Part 63, Subpart QQQQ) (Renewal)

1. Identification of the Information Collection

1(a) Title of the Information Collection

NESHAP for the Wood Building Products Surface Coating Industry (40 CFR Part 63, Subpart QQQQ) (Renewal), EPA ICR Number 2034.06, OMB Control Number 2060-0510

1(b) Short Characterization/Abstract

The National Emission Standards for Hazardous Air Pollutants (NESHAP) for the Wood Building Products Surface Coating Industry were proposed on June 21, 2002 and promulgated on May 28, 2003. These regulations apply to new and existing facilities that perform surface coating of wood building products where the total Hazardous Air Pollutants (HAPs) emitted are greater than or equal to 10 tons per year of any one HAP, or where the total HAPs emitted are greater than or equal to 25 tons per year of any combination of HAPs, that use at least 4,170 liters (1,100 gallons) of coatings annually. New facilities include those that commenced construction, modification, or reconstruction after the date of the proposal. This information is being collected to assure compliance with 40 CFR Part 63, Subpart QQQQ.

In general, all NESHAP standards require initial notifications, performance tests, and periodic reports by the owners/operators of the affected facilities. They are also required to maintain records of the occurrence and duration of any startup, shutdown, or malfunction in the operation of an affected facility, or any period during which the monitoring system is inoperative. These notifications, reports, and records are essential in determining compliance, and are required of all affected facilities subject to NESHAP.

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

The “Affected Public” are private sector businesses that perform surface coating of wood building products. The burden to the “Affected Public” may be found below in Table 1: Annual Respondent Burden and Cost – NESHAP for the Wood Building Products Surface Coating Industry (40 CFR Part 63, Subpart QQQQ) (Renewal). The burden to the “Federal Government” is attributed entirely to work performed by federal employees or government contractors; this burden is found below in Table 2: Average Annual EPA Burden and Cost – NESHAP for the Wood Building Products Surface Coating Industry (40 CFR Part 63, Subpart QQQQ) (Renewal).

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

Over the next three years, an average of 232 respondents per year will be subject to the standard, and no additional respondents will become subject to the standard. The industry growth rate is based on the Agency's estimate from the previous renewal. It should be noted that consultations with industry members have indicated a potential decline in the number of facilities, however the specific number of closures is unknown and therefore the number of respondents is unchanged for this ICR.

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 wood building product surface coating facilities either cause or contribute to air pollution that may reasonably be anticipated to endanger public health or welfare. Therefore, the NESHAP were promulgated for this source category at 40 CFR Part 63, Subpart QQQQ.

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, and 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 63, Subpart QQQQ.

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 (80 FR 32116) on June 5, 2015. 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 Integrated Compliance Information System (ICIS). ICIS is EPA's database for the collection, maintenance, and retrieval of compliance data for industrial and government-owned facilities. 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 previously been reviewed to determine the minimum information needed for compliance purposes. In developing this ICR, we contacted: 1) the Composite Panel Association, at (703) 724-1128; 2) Alamco Wood Products, at (877) 679-9663.

We received comments from Alamco Wood Products. The company indicated that several facilities have closed in the past few years, but did not provide a quantitative estimate on number of closures. In addition, the company estimated the base managerial labor costs at \$70.10/hr, technical labor costs at \$50/hr and clerical labor costs at \$30/hr. The base labor rates appear reasonable when compared to the labor rates referenced in this ICR; however, this ICR accounts for an additional overhead of 110 percent on top of base labor rates.

It is our policy to respond after a thorough review of comments received since the last ICR renewal as well as those submitted in response to the first Federal Register notice.

3(d) Effects of Less Frequent Collection

Less frequent information collection would decrease the margin of assurance that facilities are continuing to meet the standards. Requirements for information gathering and recordkeeping are useful techniques to ensure that good operation and maintenance practices are applied and emission limitations are met. If the information required by these standards was collected less frequently, the proper operation and maintenance of control equipment and the possibility of detecting violations would be less likely.

3(e) General Guidelines

These reporting or recordkeeping requirements do not violate any of the regulations promulgated by OMB under 5 CFR Part 1320, section 1320.5.

These standards require the respondents to maintain all records, including reports and notifications for at least five years. This is consistent with the General Provisions as applied to the standards. EPA believes that the five-year records retention requirement is consistent the Part 70 permit program and the five-year statute of limitations on which the permit program is based. The retention of records for five years allows EPA to establish the compliance history of a source, any pattern of non-compliance and to determine the appropriate level of enforcement action. EPA has found that the most flagrant violators have violations extending beyond five years. In addition, EPA would be prevented from pursuing the violators due to the destruction or nonexistence of essential records.

3(f) Confidentiality

Any information submitted to the Agency for which a claim of confidentiality is made will be safeguarded according to the Agency policies set forth in Title 40, Chapter 1, Part 2, Subpart B - Confidentiality of Business Information (CBI) (see 40 CFR 2; 41 FR 36902, September 1, 1976; amended by 43 FR 40000, September 8, 1978; 43 FR 42251, September 20, 1978; 44 FR 17674, March 23, 1979).

3(g) Sensitive Questions

The reporting or recordkeeping requirements in the standard do not include sensitive questions.

4. The Respondents and the Information Requested

4(a) Respondents/SIC Codes

The respondents to the recordkeeping and reporting requirements are wood building products surface coating facilities. The United States Standard Industrial Classification (SIC) codes for the respondents affected by the standards, which corresponds to the North American Industry Classification System (NAICS) codes, are listed below.

Standard (40 CFR Part 63, Subpart QQQQ)	SIC Codes	NAICS Codes
Hardwood Veneer and Plywood Manufacturing	2421	321211
Softwood Veneer and Plywood Manufacturing	2426	321212
Engineered Wood Member (except Truss) Manufacturing	2431	321213
Truss Manufacturing	2435	321214
Reconstituted Wood Product Manufacturing	2436	321219
Wood Window and Door Manufacturing	2439	321911
Other Millwork (including Flooring)	2493	321918
All Other Miscellaneous Wood Product Manufacturing	2499	321999

4(b) Information Requested

(i) Data Items

In this ICR, all the data that is recorded or reported is required by the NESHAP for the Wood Building Products Surface Coating Industry (40 CFR Part 63, Subpart QQQQ).

A source must make the following reports:

Notifications	
Initial notification	63.4710(b), 63.5(d), 63.9(b)
Notification of compliance status	63.4710(c), 63.9(h)
Notification of construction or reconstruction	63.5
Notification of actual startup	63.9(b)
Notification of performance test	63.7(b), 63.8(e), 63.9(e)

Reports	
Semiannual report	63.4720(a)
Excess emissions report	63.4720(a)(4-7)
Report of performance test	63.4720(b)
Startup, shutdown, malfunction report	63.4720(c)

A source must keep the following records:

Recordkeeping	
Five year retention of records	63.4731(b), 63.10(b)
Material formulation data	63.4730(b)
Records of HAP content calculations	63.4730(c)
Copies of notifications and reports	63.4730(a)
Records of names of materials used	63.4730(d)
HAP fractions in each material used	63.4730(e)
Coating solids fraction in each material used	63.4730(f)
Density of materials used	63.4730(g)
Documentation of waste material shipped offsite	63.4730 (h)
Startup, shutdown, and malfunction plan records	63.4730(i),(k),63.6(e)
Documentation of control device performance tests	63.4730(k),63.10(b)
Values measured by continuous monitoring systems	63.4730(k)
Monitoring system calibrations, maintenance	63.4730(k)
Periods of monitoring system failure shutdown	63.4730(j),(k)

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.

(ii) Respondent Activities

Respondent Activities
Familiarization with the regulatory requirements.
Install, calibrate, maintain, and operate compliance monitoring system (CMS) for temperature, for gas flow, or for pressure drop for oxidizer, carbon adsorber, condenser, concentrator, or capture system.
Perform initial performance test, Reference Method 1, 1A, 2, 2A, 2C, 2D, 2F, 2G, 3, #A, 3B, 4, 24, 25, 25A, 204, 204A, 204B, 204C, 204D, 204E, 204F, 311, or ASTM Method D1475-98, D2697-86, D6093-97 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.

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 Enforcement and Compliance History Online (ECHO)

Agency Activities
and ICIS.

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 reported by state and local governments in the ICIS Air database, which is operated and maintained by EPA's Office of Compliance. ICIS is EPA's database for the collection, maintenance, and retrieval of compliance data for industrial and government-owned facilities. EPA uses ICIS 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

A majority of the respondents are small entities (i.e., small businesses). The impact on small entities 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. According to the Industry Profile for the Proposed Wood Building Products NESHAP¹, 97 percent of the parent companies affected by proposed action were estimated to be small entities as defined by the Small Business Administration. The Agency assumes that 97 percent of the 232 facilities affected by this ICR, or 225 facilities, are small entities.

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 the Wood Building Products Surface Coating Industry (40 CFR Part 63, Subpart QQQQ) (Renewal).

¹ Industry Profile for the Proposed Wood Building Products, NESHAP Final Report, U.S. EPA, EPA-453/R-01-002

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 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 75,800 (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 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	\$129.93 (\$61.87+ 110%)
Technical	\$103.97 (\$49.51 + 110%)
Clerical	\$51.79 (\$24.66 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, June 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	(G) Total O&M, (E X F)
CEM	\$16,000	0	\$0	\$1,200	232	\$278,400
Total			\$0			\$278,000

Note: Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

The total capital/startup costs for this ICR are \$0. This is the total of column D in the above table.

The total operation and maintenance (O&M) costs for this ICR are \$278,000. 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 \$278,000. 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 \$389,000.

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 – NESHP for the Wood Building Products Surface Coating Industry (40 CFR Part 63, Subpart QQQQ) (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

232 existing respondents will be subject to the standard. It is estimated that no additional respondents will become subject. The overall average number of respondents, as shown in the table below is 232 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	0	232	0	0	232
2	0	232	0	0	232
3	0	232	0	0	232
Average	0	232	0	0	232

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 232.

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 compliance status	0	1	0	0
Notification of construction/reconstruction	0	1	0	0
Notification of actual startup	0	1	0	0
Notification of performance test 1	0	1.2	0	0
Report of performance test	0	1.2	0	0
Semiannual report	232	2	0	464
Excess emissions report	232	0.5	0	116
Startup, shutdown, malfunction report	232	0.5	0	116
			Total	696

The number of Total Annual Responses is 696.

The total annual labor costs are \$7,600,000. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NESHA for the Wood Building

Products Surface Coating Industry (40 CFR Part 63, Subpart QQQQ) (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 75,800 hours at a cost of \$7,600,000. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost - NESHAP for the Wood Building Products Surface Coating Industry (40 CFR Part 63, Subpart QQQQ) (Renewal).

We assume that burdens for managerial tasks take 5% of the time required for technical tasks because the typical tasks for managers are to review and approve reports. Clerical burdens are assumed to take 10% of the time required for technical tasks because the typical duties of clerical staff are to proofread the reports, make copies and maintain records.

Furthermore, the annual public reporting and recordkeeping burden for this collection of information is estimated to average 109 hours per response.

The total annual capital/startup and O&M costs to the regulated entity are \$278,000. 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 8,540 labor hours at a cost of \$389,000. See below Table 2: Average Annual EPA Burden and Cost – NESHAP for the Wood Building Products Surface Coating Industry (40 CFR Part 63, Subpart QQQQ) (Renewal).

We assume that burdens for managerial tasks take 5% of the time required for technical tasks because the typical tasks for managers are to review and approve reports. Clerical burdens are assumed to take 10% of the time required for technical tasks because the typical duties of clerical staff are to proofread the reports, make copies and maintain records.

6(f) Reasons for Change in Burden

There is a small adjustment increase in the respondent and Agency labor hours in this ICR compared to the previous ICR. There is also a decrease in the total O&M costs. This is not due to program changes; rather, the changes occurred because we are rounding total values in this ICR to three significant figures.

In addition, there is an increase in labor costs for both the respondents and the Agency due to an increase in labor rates. This ICR uses updated labor rates from the Bureau of Labor Statistics to calculate burden costs.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 109 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-2011-0274. 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-2011-0274 and OMB Control Number 2060-0510 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 the Wood Building Products Surface Coating Industry (40 CFR Part 63, Subpart QQQQ) (Renewal)

Burden Item	(A) Person- hours per occurrence	(B) Number of occurrences per year	(C) Person- hrs. per respondent per year (C=AxB)	(D) Respondents per year ^a	(E) Technical person- hrs. per year (E=CxD)	(F) Management person-hrs. per year (F=Ex0.05)	(G) Clerical person- hrs. per year (G=Ex0.1)	(H) Annual costs (\$) ^b
1. Reporting requirements								
a. Familiarize with rule requirements	4	1	4	232	928	46.4	92.8	\$107,040.62
b. Process/review information	4	4	16	232	3712	185.6	371.2	\$428,162.50
c. Write reports								
i. Initial notification	2	1	2	0	0	0	0	\$0
ii. Notification of compliance status	2	1	2	0	0	0	0	\$0
iii. Notification of construction/reconstruction	2	1	2	0	0	0	0	\$0
iv. Notification of actual startup	2	1	2	0	0	0	0	\$0
v. Notification of performance test	2	1.2	2.4	0	0	0	0	\$0
vi. Report of performance test	10	1.2	12	0	0	0	0	\$0
vii. Semiannual report	6	2	12	232	2,784	139.2	278.4	\$321,121.87
viii. Excess emissions report	4	0.5	2	232	464	23.2	46.4	\$53,520.31
ix. Startup, shutdown, malfunction report	4	0.5	2	232	464	23.2	46.4	\$53,520.31
Subtotal for Reporting Requirements						9,605		\$963,366
2. Recordkeeping requirements								
a. Familiarize with rule requirements	4	1	4	232	928	46.4	92.8	\$107,040.62

b. Plan activities	12	1	12	232	2,784	139.2	278.4	\$321,121.87
c. Implement activities	12	1	12	232	2,784	139.2	278.4	\$321,121.87
d. Maintain record system for material used	20	1	20	232	4,640	232	464	\$535,203.12
e. Time to enter information								
i. Material usage	0.5	260	130	232	30,160	1508	3016	\$3,478,820.28
ii. Compliance calculation	2	12	24	232	5,568	278.4	556.8	\$642,243.74
f. Time to train personnel	10	1	10	232	2,320	116	232	\$267,601.56
g. Store, file, and maintain records	2	12	24	232	5,568	278.4	556.8	\$642,243.74
h. Retrieve records/reports	1	12	12	232	2,784	139.2	278.4	\$321,121.87
Subtotal for Recordkeeping Requirements						66,166		\$6,636,519
TOTAL LABOR BURDEN AND COST (rounded) ^c						75,800		\$7,600,000
Capital and O&M Cost ^c								\$278,000
Grand TOTAL ^c								\$7,880,000

Assumptions:

^a There is an average of 232 respondents per year over the next three years of this ICR. In addition, we have assumed that no new facility will become subject to this regulation.

^b This ICR uses the following labor rates: \$123.93 per hour for Executive, Administrative, and Managerial labor; \$103.97 per hour for Technical labor, and \$51.79 per hour for Clerical labor. These rates are from the United States Department of Labor, Bureau of Labor Statistics, June 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% to account for the benefit packages available to those employed by private industry.

^c Totals have been rounded to 3 significant digits. Figures may not add exactly due to rounding.

Table 2: Average Annual EPA Burden and Cost – NESHAP for the Wood Building Products Surface Coating Industry (40 CFR Part 63, Subpart QQQQ) (Renewal)

Burden Item	(A) EPA Person- hours per activity	(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 (D=Cx0.05)	(G) Clerical person- hours per year (E=Cx0.1)	(H) Annual costs (\$) ^b
1. Initial performance test	24	0	0	0	0	0	0	\$0
2. Repeat performance test	24	0	0	0	0	0	0	\$0
3. Report review								
a) Initial notification	8	0	0	0	0	0	0	\$0
b) Notification of performance test	8	0	0	0	0	0	0	\$0
c) Notification of compliance status	8	0	0	0	0	0	0	\$0
d) Notification of construction/reconstruction	8	0	0	0	0	0	0	\$0
e) Notification of actual startup	8	0	0	0	0	0	0	\$0
f) Notification of performance test	8	0	0	0	0	0	0	\$0
g) Report of performance test	8	0	0	0	0	0	0	\$0
h) Semiannual report	12	2	24	232	5,568	278.4	556.8	\$291,429
i) Excess emissions report	8	0.5	4	232	928	46.4	92.8	\$48,572
j) Startup, shutdown, malfunction report	8	0.5	4	232	928	46.4	92.8	\$48,572
Total Burden Hours and Costs ^c						8,540		\$389,000

Assumptions:

^a There is an average of 232 respondents per year over the next three years of this ICR. In addition, we have assumed that no new facility will become subject to this regulation.

^b This cost is based on the following labor rates which incorporates a 1.6 benefits multiplication factor to account for government overhead expenses: Managerial

rate of \$62.90 (GS-13, Step 5, $\$39.31 \times 1.6$), Technical rate of \$46.67 (GS-12, Step 1, $\$29.17 \times 1.6$), and Clerical rate of \$25.25 (GS-6, Step 3, $\$15.78 \times 1.6$). These rates are from the Office of Personnel Management (OPM) 2014 General Schedule which excludes locality rates of pay.

^c Totals have been rounded to 3 significant digits. Figures may not add exactly due to rounding.