

**SUPPORTING STATEMENT  
ENVIRONMENTAL PROTECTION AGENCY**

**NESHAP for Plastic Parts and Products Surface Coating (40 CFR Part 63, Subpart PPPP)  
(Renewal)**

**1. Identification of the Information Collection**

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

NESHAP for Plastic Parts and Products Surface Coating (40 CFR Part 63, Subpart PPPP) (Renewal), EPA ICR Number 2044.06, OMB Control Number 2060-0537.

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

The National Emission Standards for Hazardous Air Pollutants (NESHAP) for Plastic Parts and Products Surface Coating were proposed on December 4, 2002, and promulgated on April 19, 2004. The regulations were revised on April 24, 2007 in order to clarify the applicability of the rule and to correct certain errors in the regulatory text; there was no associated change in monitoring or recordkeeping requirements. These regulations apply to both new and existing facilities that perform surface coating of plastic parts and 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, and that use at least 100 gallons of HAP-containing coatings annually. 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 PPPP.

In general, all NESHAP standards require initial notification reports, 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 containing these documents, and retain the file for at least five years following the generation date of such 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 “burden” to the Affected Public may be found below in Table 1: Annual Respondent Burden and Cost – NESHAP for Plastic Parts and Products Surface Coating (40 CFR Part 63, Subpart PPPP) (Renewal). The Federal Government’s burden is attributed entirely to work performed by either Federal employees or government contractors and may be found below in Table 2: Average Annual EPA Burden and Cost – NESHAP for Plastic Parts and Products Surface Coating (40 CFR Part 63, Subpart PPPP) (Renewal).

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).

Over the next three years, approximately 835 respondents per year will be subject to these standards, and one additional respondents per year will become subject to these same standards.

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 plastic parts and products surface coating operations either cause or contribute to air pollution that may reasonably be anticipated to endanger public health and/or welfare. Therefore, the NESHAP were promulgated for this source category at 40 CFR Part 63, Subpart PPPP.

### **2(b) Practical Utility/Users of the Data**

The recordkeeping and reporting requirements in these standards 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 standards. Continuous emission monitors are used to ensure compliance with these standards 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 these standards 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 are 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 PPPP.

#### **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 these standards, 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 these standards as it was being developed. In developing this ICR, we contacted: 1) the American Coatings Association (ACA), at (202) 462-6272; and 2) the Molded Fiber Glass Companies at (440) 813-1188.

It is our policy to respond after a thorough review of comments received since the last ICR renewal as well as those submitted in response to the first Federal Register notice. In this case, no comments were received.

### **3(d) Effects of Less-Frequent Collection**

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

### **3(e) General Guidelines**

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

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

### **3(f) Confidentiality**

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

### **3(g) Sensitive Questions**

The reporting or recordkeeping requirements in these standards do not include sensitive questions.

#### 4. The Respondents and the Information Requested

##### 4(a) Respondents/SIC Codes

The respondents to the recordkeeping and reporting requirements are owners and operators of plastic parts and products surface coating operations. The United States Standard Industrial Classification (SIC) codes for the respondents affected by the standards and the corresponding North American Industry Classification System (NAICS) codes are listed in the following table.

<b>Standard (40 CFR Part 63, Subpart PPPP)</b>	<b>SIC Codes</b>	<b>NAICS Codes</b>
Office Furniture (except Wood) Manufacturing	2522	337214
Polystyrene Foam Product Manufacturing	3086	32614, 32615
All Other Plastics Product Manufacturing	3089, 3999	326199
Office Machinery Manufacturing	3578, 3579	333313
Radio and Television Broadcasting and Wireless Communications Equipment Manufacturing	3663, 3679	33422
All Other Motor Vehicle Parts Manufacturing	3429, 3519, 3599,3714,3799	336399
All Other Transportation Equipment Manufacturing	3799	336999
Laboratory Apparatus and Furniture Manufacturing	2599, 3821, 3841	339111, 339112
Sporting and Athletic Goods Manufacturing	3949, 3069	33992
Sign Manufacturing	3993	33995
All Other Miscellaneous Manufacturing	2499, 3634, 3999	339999

##### 4(b) Information Requested

###### (i) Data Items

In this ICR, all the data that is recorded or reported is required by the NESHAP for Plastic Parts and Products Surface Coating (40 CFR Part 63, Subpart PPPP).

A source must make the following reports:

<b>Notifications</b>	
Initial notification	63.4510(b), 63.5(d), 63.9(b)

<b>Notifications</b>	
Notification of compliance status	63.4510(c), 63.9(h)
Notification of construction or reconstruction	63.4510(a), 63.5
Notification of actual startup	63.4510(a), 63.9(b)
Notification of performance test	63.4510(a), 63.7(b), 63.8(e), 63.9(e)

<b>Reports</b>	
Semiannual report	63.4520(a)
Excess emissions report	63.4520(a)(4-7)
Report of performance test	63.4520(b)
Startup, shutdown, malfunction report	63.4520(c)

A source must keep the following records:

<b>Recordkeeping</b>	
Five-year retention of records	63.4531(b), 63.10(b)
Material formulation data	63.4530(b)
Records of HAP content calculations	63.4530(c)
Copies of notifications and reports	63.4530(a)
Records of names and mass of materials used	63.4530(d)
HAP mass fractions in each material used	63.4530(e)
Coating solids mass fraction in each material used	63.4530(f)
Density of materials used	63.4530(b)
Documentation of waste material shipped offsite	63.4530(g)
Documentation of deviations	63.4530(h)
Startup, shutdown, and malfunction plan/records	63.4530(i), 63.6(e)
Records of continuous compliance with operating limits	63.4530(i)
Documentation of capture system efficiency determination	63.4530(i)
Documentation of add-on control device destruction or removal efficiency determination	63.4530(i)
Documentation of control device performance tests	63.4530(i), 63.10(b)
Determination of capture system and add-on control operating limits	63.4530(i)

<b>Recordkeeping</b>	
Work practice plan/records	63.4530(i)

### 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**

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

## **5. The Information Collected: Agency Activities, Collection Methodology, and Information Management**

### **5(a) Agency Activities**

EPA conducts the following activities in connection with the acquisition, analysis,

storage, and distribution of the required information:

<b>Agency Activities</b>
Review notifications and reports, including performance test reports, and excess emissions reports, required to be submitted by industry.
Audit facility records.
Input, analyze, and maintain data in the Enforcement and Compliance History Online (ECHO) 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 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 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**

According to the Final Rule notice published in the Federal Register on April 19, 2004 (75 FR 20968), approximately 51 percent of the total number of firms affected by this rule are small entities. While the number of small firms appears to be a large proportion of the total number of affected firms, the small firms experience 21 percent of the total national compliance cost. Therefore, this ICR assumes at least 21 percent of the total affected facilities are owned by small entities.

Although the Final Rule will not have a significant economic impact on a substantial number of small entities, EPA nonetheless has worked aggressively to minimize the impact of the final rule on small entities. EPA solicited input from small entities during the data-gathering phase of the rulemaking. EPA promulgated compliance options that give small entities flexibility



in choosing the most cost-effective and least burdensome alternative for their operation. For example, a facility could purchase and use lower or non-HAP coatings, thinners, and cleaning materials (i.e., pollution prevention) that meet the Final Rule rather than being required to purchase add-on control systems. The lower or non-HAP option can be demonstrated with minimum burden by using already-maintained purchase and usage records. No testing of materials would be required as the facility owner could show that their coatings meet the emission limits by providing formulation data supplied by the manufacturer.

EPA also provides one option that allows compliance demonstrations to be conducted on a rolling 12-month basis, meaning that each month the facility would calculate a 12-month organic HAP emission rate for the previous 12 months to determine compliance. This gives affected small entities extra flexibility in complying with the emission limits since small entities are more likely to use lower monthly volumes and/or a limited number of materials. Furthermore, EPA has promulgated the minimum monitoring, recordkeeping and reporting requirements needed for enforcement and compliance assurance.

#### **5(d) Collection Schedule**

The specific frequency for each information collection activity within this request is shown below in Table 1: Annual Respondent Burden and Cost – NESHAP for Plastic Parts and Products Surface Coating (40 CFR Part 63, Subpart PPPP) (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 324,000 hours (Total Labor Hours from Table 1 below). These hours are based on Agency studies and background documents from the development of the regulation, Agency knowledge and experience with the 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 standards are both labor costs which are addressed elsewhere in this ICR and the costs associated with continuous monitoring. The capital/startup costs are one-time costs when a facility becomes subject to the regulation. The annual operation and maintenance costs are the ongoing costs to maintain the monitors and other costs such as photocopying and postage.

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

Capital/Startup vs. Operation and Maintenance (O&M) Costs						
(A) Continuous Monitoring Device	(B) Capital/Startup Cost for One Respondent	(C) Number of New Respondents	(D) Total Capital/Startup Cost, (B X C)	(E) Annual O&M Costs for One Respondent	(F) Number of Respondents with O&M	(G) Total O&M, (E X F)
CEMS	\$16,000	1	\$16,000	\$1,200	209 <sup>1</sup>	\$251,000

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

<sup>1</sup> Estimated 25 percent of existing facilities use add-on controls.

The total capital/startup costs for this ICR are \$16,000. This is the total of column D in the above table.

The total operation and maintenance (O&M) costs for this ICR are \$251,000. 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 \$267,000. 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 \$1,490,000.

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 – NESHAP for Plastic Parts and Products Surface Coating (40 CFR Part 63, Subpart PPPP) (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 834 existing respondents will be subject to these standards. It is estimated that an additional respondent per year will become subject to these same standards. The overall average number of respondents, as shown in the table below, is 835 per year.

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

<b>Number of Respondents</b>					
	Respondents That Submit Reports		Respondents That Do Not Submit Any Reports		
Year	(A) Number of New Respondents <sup>1</sup>	(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	1	833	0	0	834
2	1	834	0	0	835
3	1	835	0	0	836
Average	1	834	0	0	835

<sup>1</sup> 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 835.

The total number of annual responses per year is calculated using the following table:

<b>Total Annual Responses</b>				
(A) Information Collection Activity	(B) Number of Respondents	(C) Number of Responses	(D) Number of Existing Respondents That Keep Records But Do Not Submit Reports	(E) Total Annual Responses E=(BxC)+D
Initial notification	1	1	0	1
Notification of compliance status	1	1	0	1
Notification of construction/reconstruction	1	1	0	1
Notification of actual startup	1	1	0	1
Notification of performance test	1	1.2	0	1.2
Report of performance test	1	1.2	0	1.2
Semiannual report	835	2	0	1,670
Excess emissions report	835	2	0	1,670
Startup, shutdown, malfunction report	209	1	0	209
			Total	3,555

The number of Total Annual Responses is 3,555.

The total annual labor costs are \$32,500,000. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NESHAP for Plastic Parts and Products Surface Coating (40 CFR Part 63, Subpart PPPP) (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 below in Tables 1 and 2, respectively, and summarized below.

#### **(i) Respondent Tally**

The total annual labor hours are 324,000 hours. Details regarding these estimates may be found in Table 1: Annual Respondent Burden and Cost – NESHAP for Plastic Parts and Products Surface Coating (40 CFR Part 63, Subpart PPPP) (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 91 hours per response.

The total annual capital/startup and O&M costs to the regulated entity are \$267,000. 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 32,700 labor hours at a cost of \$1,490,000. See below in Table 2: Average Annual EPA Burden and Cost – NESHAP for Plastic Parts and Products Surface Coating (40 CFR Part 63, Subpart PPPP) (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 an adjustment increase in burden from the most recently approved ICR. This is not due to program changes; rather, the increase occurred because we assume the industry has grown, and will continue to grow, at a rate of one new source per year. This increase in the estimated number of sources results in increases in the respondent labor hours, total O&M costs, and number of responses.

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

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 91 hours per response. Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to a collection of information; search data sources; complete and review the collection of information; and transmit or otherwise disclose the information.

An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a valid OMB Control Number. The OMB Control Numbers for EPA regulations are listed at 40 CFR Part 9 and 48 CFR Chapter 15.

To comment on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques, EPA has established a public docket for this ICR under Docket ID Number EPA-HQ-OECA-2012-0688. 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), WJC West, Room 3334, 1301 Constitution Ave., NW, Washington, DC. The EPA Docket Center Public Reading Room is open from 8:30 a.m. to 4:30 p.m., Monday through Friday, excluding legal holidays. The telephone number for the Reading Room is (202) 566-1744, and the telephone number for the docket center is (202) 566-1752. Also, you can send comments to the Office of Information and Regulatory Affairs, Office of Management and Budget, 725 17th Street, NW, Washington, DC 20503, Attention: Desk Officer for EPA. Please include the EPA Docket ID Number EPA-HQ-OECA-2012-0688 and OMB Control Number 2060-0537 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 Plastic Parts and Products Surface Coating (40 CFR Part 63, Subpart PPPP) (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 <sup>a</sup>	(E) Technical person hrs per year (E=CxD)	(F) Manage- ment person hrs per year (F=Ex0.05)	(G) Clerical person hrs per year (G=Ex0.1)	(H) Cost per year (\$) <sup>b</sup>
1. Reporting requirements								
a. Familiarization with the regulatory requirements	4	1	4	835	3,340	167	334	\$386,255.97
b. Process/review information	4	4	16	835	13,360	668	1,336.0	\$1,545,023.88
c. Write reports								
i. Initial notification	2	1	2	1	2	0.1	0.2	\$231.29
ii. Notification of compliance status	2	1	2	1	2	0.1	0.2	\$231.29
iii. Notification of construction/ reconstruction	2	1	2	1	2	0.1	0.2	\$231.29
iv. Notification of actual startup	2	1	2	1	2	0.1	0.2	\$231.29
v. Notification of performance test	2	1.2	2.4	1	2	0.12	0.24	\$277.55
vi. Report of performance test	10	1.2	12	1	12	0.6	1.2	\$1,387.75
vii. Semiannual report <sup>c</sup>	6	2	12	835	10,020	501	1002	\$1,158,767.91
viii. Excess emissions report	2	2	4	835	3,340	167	334	\$386,255.97
ix. Startup, shutdown, malfunction report <sup>d</sup>	2	1	2	209	418	20.9	41.8	\$48,339.82
<b>Subtotal for Reporting Requirements</b>						<b>35,075</b>		<b>\$3,527,234.01</b>
2. Recordkeeping requirements								
a. Familiarization with the regulatory requirements	4	1	4	835	3,340	167	334	\$386,255.97
b. Plan activities	12	1	12	835	10,020	501	1002	\$1,158,767.91
c. Implement activities	12	1	12	835	10,020	501	1002	\$1,158,767.91
d. Maintain record system for material used	20	1	20	835	16,700	835	1670	\$1,931,279.85
e. Time to enter information								
i. Material usage <sup>e</sup>	0.5	365	182.5	835	152,388	7,619.4	15,239	\$17,622,928.63

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 <sup>a</sup>	(E) Technical person hrs per year (E=CxD)	(F) Manage- ment person hrs per year (F=Ex0.05)	(G) Clerical person hrs per year (G=Ex0.1)	(H) Cost per year (\$) <sup>b</sup>
ii. Compliance calculation <sup>f</sup>	2	12	24	835	20,040	1002	2,004.0	\$2,317,535.82
f. Time to train personnel	10	1	10	835	8,350	417.5	835	\$965,639.93
g. Store, file, and maintain records <sup>g</sup>	2	12	24	835	20,040	1002	2,004.0	\$2,317,535.82
h. Retrieve records/reports	1	12	12	835	10,020	501	1002	\$1,158,767.91
<b>Subtotal for Recordkeeping Requirements</b>						<b>288,555</b>		<b>\$29,017,479.75</b>
<b>TOTAL ANNUAL BURDEN AND COSTS (rounded):<sup>i</sup></b>						<b>324,000</b>		<b>\$32,500,000</b>
<b>Capital and O&amp;M Cost (see Section 6(b)(iii)):<sup>i</sup></b>								<b>\$267,000</b>
<b>TOTAL COST:<sup>i</sup></b>								<b>\$32,800,000</b>

**Assumptions:**

<sup>a</sup> We have assumed that there are approximately 835 respondents, with one additional new source becoming subject to the rule over the next three years of this ICR.

<sup>b</sup> This ICR uses the following labor rates: Managerial \$129.93 (\$61.87+ 110%) , Technical \$103.97 (\$49.51 + 110%), and 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. This ICR assumes that Clerical hours are 10% of Technical hours and Managerial hours are 5% of Technical hours.

<sup>c</sup> We assume that each respondent will take 6 hours two time per year to write semiannual report.

<sup>d</sup> It is estimated that 25 percent of facilities use add-on controls submit startup, shutdown, and malfunction report once per year.

<sup>e</sup> We assumed that each respondent will take 0.5 hours each day to enter daily records of mass fraction of organic HAP for each coating, thinner, or cleaning material, and mass fraction of coating solids for each coating.

<sup>f</sup> We have assumed that each respondent will take 2 hours once per month to enter compliance calculation.

<sup>g</sup> We have assumed that each respondent will take 2 hours once per month to store, file and maintain records.

<sup>h</sup> We have assumed that each respondent will take 1 hour once per month to retrieve records/reports.

<sup>i</sup> Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.



**Table 2: Average Annual EPA Burden and Cost – NESHAP for Plastic Parts and Products Surface Coating (40 CFR Part 63, Subpart PPPP) (Renewal)**

Burden Item	(A) EPA Person hours per occurrence	(B) Number of occurrences per year	(C) EPA Person hrs per plant per year (C=AxB)	(D) Plants per year <sup>a</sup>	(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) Cost per year (\$) <sup>b</sup>
1. Initial performance test	24	1	24	1	24	1.2	2.4	\$1,256.16
1. Repeat performance test	24	0.2	4.8	1	4.8	0.24	0.48	\$251.23
3. Report review								
a. Initial notification	8	1	8	1	8	0.4	0.8	\$418.72
b. Notification of compliance status	8	1	8	1	8	0.4	0.8	\$418.72
c. Notification of construction/reconstruction	8	1	8	1	8	0.4	0.8	\$418.72
d. Notification of actual startup	8	1	8	1	8	0.4	0.8	\$418.72
e. Notification of performance test	8	1.2	9.6	1	9.6	0.48	0.96	\$502.46
f. Report of performance test	8	1.2	9.6	1	9.6	0.48	0.96	\$502.46
g. Semiannual report <sup>c</sup>	12	2	24	835	20,040	1002	2,004.0	\$1,048,893.60
h. Excess emissions report <sup>d</sup>	4	2	8	835	6,680	334	668	\$349,631.20
i. Startup, shutdown, malfunction report	8	1	8	209	1,672	83.6	167.2	\$87,512.48
<b>Total Burden (rounded):<sup>e</sup></b>						<b>32,700</b>		<b>\$1,490,000</b>

**Assumptions:**

<sup>a</sup> We have assumed that there are approximately 835 respondents, with one additional new source becoming subject to the rule over the next three years of this ICR.

<sup>b</sup> This ICR uses the following labor rates: Managerial \$62.90 (GS-13, Step 5, \$39.31 + 60%) Technical \$46.67 (GS-12, Step 1, \$29.17 + 60%), and Clerical \$25.25 (GS-6, Step 3, \$15.78 + 60%). These rates are from the Office of Personnel Management (OPM), 2016 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. This ICR assumes that Clerical hours are 10% of Technical hours and Managerial hours are 5% of Technical hours.

<sup>c</sup> We have assumed that each respondent will take 12 hours two times per year to review semiannual report.

<sup>d</sup> We have assumed that each respondent will take 4 hours two times per year to review the excess emissions report.

<sup>e</sup> Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.