

**SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY**

**NESHAP for Miscellaneous Coating Manufacturing (40 CFR Part 63, Subpart HHHHH)
(Renewal)**

1. Identification of the Information Collection

1(a) Title of the Information Collection

NESHAP for Miscellaneous Coating Manufacturing (40 CFR Part 63, Subpart HHHHH) (Renewal), EPA ICR Number 2115.05, OMB Control Number 2060-0535.

1(b) Short Characterization/Abstract

The National Emission Standards for Hazardous Air Pollutants (NESHAP) for Miscellaneous Coating Manufacturing were proposed on April 4, 2002, and promulgated on December 11, 2003. These regulations were most-recently amended on October 4, 2006. The most recent amendment revised the introductory text. These regulations apply to existing facilities and new facilities that manufacture a miscellaneous coating and are either located at, or are part of, major sources of hazardous air pollutant (HAP) emissions. A facility is subject to the NESHAP if it meets the following criteria:

- Is located at or is part of a major source of HAP emissions;
- Manufactures coatings, including inks, paints, or adhesives described by Standard Industrial Classification (SIC) codes 285 or 289, or North American Industrial Classification System (NAICS) codes 3255 or 3259;
- Processes, uses, or produces HAP;
- Is not part of an affected source under another subpart of 40 CFR Part 63.

A “major source” means the process equipment used to manufacture the miscellaneous coatings and any other operations or equipment at the facility emit, or have the potential to emit, 10 tons per year or more of a single HAP or 25 tons per year or more of any combination of HAPs. 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 HHHHH.

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 respondents to this ICR (the “Affected Public”) are publicly-owned entities that are operated miscellaneous coating manufacturing plants. None of the facilities are owned by either state, or local and tribal agencies or the Federal government. The “burden” to the Affected Public may be found below in Table 1: Annual Respondent Burden and Cost – NESHAP for Miscellaneous Coating Manufacturing (40 CFR Part 63, Subpart HHHHH) (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 Miscellaneous Coating Manufacturing (40 CFR Part 63, Subpart HHHHH) (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, approximately 44 existing respondents per year will be subject to these standards, and no additional respondents per year will become subject to the same standards. The Agency derived this estimate in consultation with industry trade association during the renewal of 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 miscellaneous coating manufacturers 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 HHHHH.

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 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 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 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 HHHHH.

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 these standards as they were being developed. In developing this ICR, we contacted both the American Coatings Association (ACA), at (202) 462-8731; and the Adhesive and Sealant Council (ASC), at (301) 986-9700. ACA provided comments and feedback on the current respondent universe, which has been incorporated into this ICR. EPA is continuing to consult with ACA to further refine the number of respondents, and the estimate may be updated in the future.

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

3(d) Effects of Less-Frequent Collection

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

3(e) General Guidelines

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

These standards require the respondents to maintain all records, including reports and notifications for at least five years. This is consistent with the General Provisions as applied to the standards. EPA believes that the five-year records retention requirement is consistent with the Part 70 permit program and the five-year statute of limitations on which the permit program is

based. The retention of records for five years allows EPA to establish the compliance history of a source, any pattern of non-compliance and to determine the appropriate level of enforcement action. EPA has found that the most flagrant violators have violations extending beyond five years. In addition, EPA would be prevented from pursuing the violators due to the destruction or nonexistence of essential records.

3(f) Confidentiality

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

3(g) Sensitive Questions

The reporting or recordkeeping requirements in 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 miscellaneous coating manufacturing plants. The United States Standard Industrial Classification (SIC) codes and the corresponding North American Industry Classification System (NAICS) codes for the respondents affected by the standard are listed in the table below.

Standard (40 CFR Part 63, Subpart HHHHH)	SIC Codes	NAICS Codes
Paint, Coating, and Adhesive Manufacturing	285	3255
Other Chemical Product and Preparation Manufacturing	289	3259

4(b) Information Requested

(i) Data Items

In this ICR, all the data that is either recorded or reported is required by the NESHAP for Miscellaneous Coating Manufacturing (40 CFR Part 63, Subpart HHHHH).

A source must make the following reports:

Notifications	
Notification and application of construction or reconstruction	63.9(b)(1)-(3),

Notifications	
	63.8070(a)
Notification of anticipated date of initial startup	63.9(b)(4), 63.8070(b)(2)
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 opacity or visible emission observations	63.8070(a), 63.6(h)(4)
Notification of performance test, test plan, and emission profile	63.7(b)-(c), 63.9(e), 63.8070(a),(d)
Notification of CMS performance evaluation	63.8(e)(2), 63.9(g)
Notification of compliance status (including performance test results)	63.9(h), 63.10(d)(2), 63.8070(e)
Notification of process change	63.8070(f)
Emissions averaging plan	63.1250-63.1260, 63.8060

Reports	
Pre-compliance report	63.8075(c)
Semiannual compliance report	63.10(e)(3)
\$ Startup, shutdown, and malfunction reports	63.8075(b),(d)
\$ Deviations/no deviations/out-of-control CMS	63.10(d)(5) 63.8075(d)
\$ No out-of-control CMS	(4)
\$ Heat exchange system reports (delay of repair)	63.8075(d)(5)
\$ Maintenance and inspection reports for storage tank control devices	63.8(c)(7) 63.8075(d)(6)
\$ Operating scenario reports	63.104(e), (f)(2)(i)-(iv),
\$ Equipment leak reports	63.8075(d)(7)
\$ Emissions averaging reports	63.1063(c)(2)(iv)(B) or (e)(2),
	63.8075(d)(8)
	63.8075(d)(9)
	63.1039(b)(1)-(8)
	63.8075(d)(10)
	63.1250-63.1260,

Reports	
	63.8060

A source must keep the following records:

Recordkeeping	
Record retention	63.10(b)(1), 63.8085
Documentation supporting initial notifications and notifications of compliance status	63.10(b)(2)(xiv), 63.8080(a)(1)
Startup, shutdown, and malfunction plan	63.6(e)(3)
Records related to startup, shutdown, and malfunction	63.6(e)(3)(iii)-(iv), 63.8080(a)(2)
Records of performance tests and CMS performance evaluations	63.10(b)(2)(viii), 63.8080(a)(3)
Records for equipment leaks	63.1038(b)-(c), 63.8080(a)(4)
Daily schedule or log of each operating scenario	63.8080(a)(5)
Records for process vessels complying with percent reduction emission limitation	63.8080(a)(6)
Planned routine maintenance records for storage tank control devices	63.8080(a)(7)
Maintenance wastewater plan	63.8080(a)(8)
Records for safety device openings	63.8080(a)(9)
Results of each CMS calibration, validation check, and inspection	63.8035(c)(6)-(8), (d) (4)-(5), (e)(4)-(7), (f) (3)-(4), 63.8080(a)(10)
Records for emissions averaging	63.1250-63.1260, 63.8060
Records for each CMS	3.8(d)(3), 63.8(f)(6)(i), 63.10(b)(2)(vi)-(xi), 63.8080(b)

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 opacity and/or parameter monitors.
Perform initial performance 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
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 standards, 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

A 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 below in Table 1: Annual Respondent Burden and Cost – NESHAP for Miscellaneous Coating Manufacturing (40 CFR Part 63, Subpart HHHHH) (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 55,800 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	\$138.43 (\$65.92+ 110%)
Technical	\$106.45 (\$50.69 + 110%)
Clerical	\$52.77 (\$25.13 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, September 2015, "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 regulations. 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)
Process Vessels	\$30,000	0	\$0	\$16,000	44	\$704,000
Transfer Operations	N/A	N/A	N/A	\$3,100	44	\$136,400
Wastewater Systems	N/A	N/A	N/A	\$2,000	44	\$88,000
Totals			\$0			\$928,000

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 \$928,000. 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 \$928,000.

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 such activities 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 \$12,900.

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

Managerial	\$64.16 (GS-13, Step 5, \$40.10 + 60%)
Technical	\$47.62 (GS-12, Step 1, \$29.76 + 60%)
Clerical	\$25.76 (GS-6, Step 3, \$16.10 + 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. Details upon which this estimate is based appear below in Table 2: Average Annual EPA Burden and Cost – NESHAP for Miscellaneous Coating Manufacturing (40 CFR Part 63, Subpart HHHHH) (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 44 existing respondents will be subject to these standards. It is estimated that no additional respondent per year will become subject. The overall average number of respondents, as shown in the table below, is 44 per year.

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

Number of Respondents					
	Respondents That Submit Reports		Respondents That Do Not Submit Any Reports		
Year	(A) Number of New Respondents ¹	(B) Number of Existing Respondents	(C) Number of Existing Respondents that keep records but do not submit reports	(D) Number of Existing Respondents That Are Also New Respondents	(E) Number of Respondents (E=A+B+C-D)
1	0	44	0	0	44
2	0	44	0	0	44
3	0	44	0	0	44
Average	0	44	0	0	44

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

Column D is subtracted to avoid double-counting respondents. As shown above, the average Number of Respondents over the three-year period of this ICR is 44.

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

Total Annual Responses				
(A) Information Collection Activity	(B) Number of Respondents	(C) Number of Responses	(D) Number of Existing Respondents That Keep Records But Do Not Submit Reports	(E) Total Annual Responses E=(BxC)+D
Notification of construction/reconstruction	0	1	N/A	0
Notification of anticipated startup	0	1	N/A	0
Notification of actual startup	0	1	N/A	0
Notification of applicability of standard	0	1	N/A	0
Emission averaging plan	0	1	N/A	0
Pre-compliance report	0	1	N/A	0
Notification of initial performance test	0	1	N/A	0
Notification of initial CMS performance evaluation	0	1	N/A	0
Notification of compliance status	0	1	N/A	0
Notification of process change	5	1	N/A	5
Semiannual report	44	2	N/A	88
Startup, shutdown, malfunction report	3	1	N/A	3
LDAR report	44	2	N/A	88
Emission averaging report	5	1	N/A	5
			Total (rounded)	189

The number of Total Annual Responses is 189.

The total annual labor costs are \$5,760,000. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NESHAP for Miscellaneous Coating Manufacturing (40 CFR Part 63, Subpart HHHHH) (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 55,800 hours. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NESHAP for Miscellaneous Coating Manufacturing (40 CFR Part 63, Subpart HHHHH) (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 295 hours per response.

The total annual capital/startup and O&M costs to the regulated entity are \$928,000. 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 278 labor hours at a cost of \$12,900. See below in Table 2: Average Annual EPA Burden and Cost – NESHAP for Miscellaneous Coating Manufacturing (40 CFR Part 63, Subpart HHHHH) (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 decrease in respondent burden in this ICR from the most-recently approved ICR. This is due to a decrease in the respondent universe. For this ICR, we have updated the estimated number of respondents based on information obtained from industry consultation. This results in a decrease in the labor hours, O&M costs, and total number of responses.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 295 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-2012-0701. 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-2012-0701 and OMB Control Number 2060-0535 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 Miscellaneous Coating Manufacturing (40 CFR Part 63, Subpart HHHHH) (Renewal)

Burden item	(A) Person hours per occurrence	(B) No. of occurrences per respondent per year	(C) Person hours per respondent per year (AxB)	(D) Respondents per year ^a	(E) Technical person- hours per year (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. Familiarization with the regulatory requirements	1	1	1	44	44	2.2	4.4	\$5,220.53
B. Required Activities								
Initial CMS performance evaluation ^d	10	1	10	0	0	0	0	\$0
Create Information	See 4							
Gather Existing Information	See 4							
C. Write Reports								
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 applicability of standard								
i. Existing sources	2	0	0	0	0	0	0	\$0
ii. New sources	2	1	2	0	0	0	0	\$0
Emissions averaging plan ^e	40	1	40	0	0	0	0	\$0
Pre-compliance report ^f	40	1	40	0	0	0	0	\$0
Notification of initial performance test ^g	2	1	2	0	0	0	0	\$0
Notification of initial CMS performance evaluation ^d	2	1	1	0	0	0	0	\$0
Notification of compliance status ^g								
i. With performance test	80	1	80	0	0	0	0	\$0
ii. Without performance test	120	1	120	0	0	0	0	\$0

Burden item	(A) Person hours per occurrence	(B) No. of occurrences per respondent per year	(C) Person hours per respondent per year (AxB)	(D) Respondents per year ^a	(E) Technical person- hours per year (CxD)	(F) Management person hours per year (Ex0.05)	(G) Clerical person hours per year (Ex0.1)	(H) Total Cost Per year ^b
Notification of process change ^h	8	1	8	5	40	2	4	\$4,745.94
Semi-annual compliance report ⁱ								
i. No deviations	4	2	8	39	312	15.6	31.2	\$37,018.33
ii. Deviations	12	2	24	5	120	6	12	\$14,237.82
Startup, shutdown, and malfunction report ^j	8	1	8	3	24	1.2	2.4	\$2,847.56
LDAR report ^k	125	2	250	44	11,000	550	1,100	\$1,305,133.50
Emissions averaging report ^l	20	1	20	5	100	5	10	\$11,864.85
Subtotal for Reporting Requirements					13,386			\$1,381,068.54
4. Recordkeeping requirements								
A. Familiarization with the regulatory requirements	See 3A							
B. Plan activities	N/A							
C. Implement Activities	N/A							
D. Develop record system ^m	40	1	40	0	0	0	0	\$0
E. Develop startup, shutdown, malfunction plan ⁿ	100	1	100	0	0	0	0	\$0
F. Develop QA/QC Plan for CMS ^o	40	1	40	0	0	0	0	\$0
G. Time to enter information								
i. Records of startup, shutdown, and malfunction	1.5	1	1.5	44	66	3.3	6.6	\$7,830.80
ii. Records of CMS data								
a. Record continuously monitored parameters	1	365	365	44	16,060	803	1,606	\$1,905,494.91
b. Compile data	24	2	48	44	2,112	105.6	211.2	\$250,585.63
c. Information for semi-annual reports	16	2	32	44	1,408	70.4	140.8	\$167,057.09
d. LDAR recordkeeping	See 3C							
H. Calibration of CMS	376	1	376	44	16,544	827.2	1,654.4	\$1,962,920.78
I. Time to train personnel ^p	40	1	40	0	0	0	0	\$0.00

Burden item	(A) Person hours per occurrence	(B) No. of occurrences per respondent per year	(C) Person hours per respondent per year (AxB)	(D) Respondents per year ^a	(E) Technical person- hours per year (CxD)	(F) Management person hours per year (Ex0.05)	(G) Clerical person hours per year (Ex0.1)	(H) Total Cost Per year ^b
J. Refresher course ^q	16	1	16	44	704	35.2	70.4	\$83,528.54
K. Time for audits	N/A							
Subtotal for Recordkeeping Requirements						42,428		4,377,417.76
TOTAL LABOR BURDEN AND COST (rounded) ^r						55,800		\$5,760,000
Capital and O&M Cost (see Section 6(b)(iii)): ^r								\$928,000
TOTAL COST: ^r								\$6,690,000

Assumptions:

- ^a. There are 44 existing major source facilities subject to the NESHAP, and no additional source per year.
- ^b. Labor cost assumes a rate of \$106.45/hour for technical labor, \$138.43/hour for management labor, and \$52.77/hour for clerical labor.
- ^c. This will occur only in the first year after a facility becomes subject to the rule.
- ^d. Assumes 10 hours to conduct a CMS performance evaluation and 2 hours to prepare a notification.
- ^e. Assumes that all existing facilities have complied with the emissions averaging requirements; new facilities are not allowed to use emissions averaging.
- ^f. Assumes 50 percent of the new facilities will submit a pre-compliance report.
- ^g. Assumes all facilities will comply by submitting engineering calculations, design calculations, etc. with no performance tests.
- ^h. Assumes 10 percent of the facilities will implement process changes.
- ⁱ. Assumes 10 percent will have deviations.
- ^j. Assumes 5% of all facilities will report actions taken during a startup, shutdown, or malfunction is not consistent with the plan.
- ^k. Assumes all facilities will be subject to the equipment leak standards with an average of 125 hours per report.
- ^l. Assumes that 10 percent of existing facilities will use with the emissions averaging reports to comply.
- ^m. Assumes 40 hours to develop a record system for recording parameter monitoring information.
- ⁿ. Assumes 80 hours to draft the startup, shutdown, and malfunction plan and another 20 hours of review/revisions, for a total of 100 hours.
- ^o. Assumes 40 hours to develop/review the QA/QC plan for the CMS. No QA/QC plan is required for the parameter monitoring systems included in the rule.
- ^p. Assumes no facilities will use the alternative standard, which requires CEMS and QA/QC plans.

^q Assumes 40 hours to train personnel and 16 hours for an annual refresher course.

^r 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 Miscellaneous Coating Manufacturing (40 CFR Part 63, Subpart HHHHH) (Renewal)

Activity	(A) EPA Hours per occurrence	(B) Number of occurrences per Year	(C) EPA Hours per Year (AxB)	(D) Plants per Year ^a	(E) Technical Hours per Year (Cx D)	(F) Managerial Hours per Year (Ex0.05)	(G) Clerical Hours per Year (Ex0.10)	(H) Total cost per year, \$ _b
Notifications/Reports								
A. Review Notification of Construction/ Reconstruction	2	1	2	0	0	0	0	\$0
B. Review Notification of Anticipated Startup	2	1	2	0	0	0	0	\$0
C. Review Notification of Actual Startup	2	1	2	0	0	0	0	\$0
D. Review Notification of Applicability of Standard	2	1	2	0	0	0	0	\$0
E. Review Notification of Initial Performance Test	2	1	2	0	0	0	0	\$0
F. Performance Test ^c	8	1	8	0	0	0	0	\$0
G. Repeat Performance Test ^d	8	0	0	0	0	0	0	\$0
H. Review Notification of Initial CMS Performance Evaluation ^e	2	1	2	0	0	0	0	\$0
I. CMS Performance Evaluation ^e	4	1	4	0	0	0	0	\$0
J. Review Emissions Averaging Plan ^f	12	1	12	0	0	0	0	\$0
K. Review Pre-compliance Report ^g	2	1	2	0	0	0	0	\$0
L. Review Notification of Compliance Status ^h								
i. With performance test	4	1	4	0	0	0	0	\$0
ii. Without performance test	4	1	4	0	0	0	0	\$0
M. Review Notification of Process Change ⁱ	6	1	6	5	30	1.5	3	\$1,602.12
N. Review Semiannual Compliance Report ^j								
i. No deviations	2	1	2	39	78	3.9	7.8	\$4,165.51
ii. Deviations	4	1	4	5	20	1	2	\$1,068.08
O. Startup, shutdown, and malfunction report ^l	2	1	2	3	6	0.3	0.6	\$320.42
R. LDAR report ^m	2	1	2	44	88	4.4	8.8	\$4,699.55

Activity	(A) EPA Hours per occurrence	(B) Number of occurrences per Year	(C) EPA Hours per Year (AxB)	(D) Plants per Year ^a	(E) Technical Hours per Year (CxD)	(F) Managerial Hours per Year (Ex0.05)	(G) Clerical Hours per Year (Ex0.10)	(H) Total cost per year, \$ _b
S. Emissions averaging report ^f	4	1	4	5	20	1	2	\$1,068.08
TOTAL ANNUAL BURDEN AND COST (rounded) ⁿ						278		\$12,900

Assumptions:

- ^a. There are 44 existing major source facilities subject to the NESHAP, and no additional source per year.
- ^b. Labor cost assumes a rate of \$46.21/hour for technical labor, \$62.27/hour for management labor, and \$25.01/hour for clerical labor.
- ^c. Assumes no initial performance tests because all facilities will comply by submitting engineering calculations.
- ^d. Assumes no repeat performance tests.
- ^e. Assumes no performance evaluations are required for the parameter monitoring systems included in the rule.
- ^f. Assumes that all existing facilities have already submitted emissions averaging plans.
- ^g. Assumes 50 percent of the new facilities will submit a pre-compliance report.
- ^h. Assumes all facilities will comply by submitting engineering calculations, design calculations, etc. with no performance tests.
- ⁱ. Assumes 10 percent of the facilities will implement process changes.
- ^j. Assumes 10 percent will have deviations.
- ^l. Assumes 5% of all facilities will report actions taken during a startup, shutdown, or malfunction is not consistent with the plan.
- ^m. Assumes all facilities will be subject to the equipment leak standards.
- ⁿ. Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.