

**SUPPORTING STATEMENT  
ENVIRONMENTAL PROTECTION AGENCY**

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

**1. Identification of the Information Collection**

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

NSPS for Polymeric Coating of Supporting Substrates Facilities (40 CFR Part 60, Subpart VVV) (Renewal), EPA ICR Number 1284.11, OMB Control Number 2060-0181.

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

The New Source Performance Standards (NSPS) for Polymeric Coating of Supporting Substrates Facilities (40 CFR Part 60, Subpart VVV) were proposed on April 30, 1987, and promulgated on September 11, 1989. These regulations apply to each existing and new coating operation and any on-site coating mix preparation equipment used to prepare coatings for the polymeric coating of supporting substrates. New facilities include those that commenced construction, modification, or reconstruction after the date of proposal. This information is being collected to assure compliance with 40 CFR Part 60, Subpart VVV.

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

Any owner/operator subject to the provisions of this part shall maintain a file containing these documents and retain the file for at least two 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.

All of the polymeric coating of supporting substrates facilities in the United States are owned and operated by the private sector (aka: the "Affected Public"). None of the facilities in the United States are owned by either state, local, tribal or the Federal government. They are all privately-owned, for-profit businesses. We assume that they will all respond to EPA inquiries. The "burden" to the Affected Public may be found below in Table 1: Annual Respondent Burden and Cost – NSPS for Polymeric Coating of Supporting Substrates Facilities (40 CFR Part 60, Subpart VVV) (Renewal). 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 – NSPS for Polymeric Coating of Supporting Substrates Facilities (40 CFR Part 60, Subpart VVV) (Renewal).

Over the next three years, approximately 61 respondents per year will be subject to these standards, and 1 additional respondents per year will become subject to these same standards. EPA also assumes that 4 existing plants per year will install new coating lines.

The active (previous) ICR had the following Terms of Clearance (TOC):

OMB files this comment in accordance with 5 CFR 1320.11(c) of the Paperwork Reduction Act and is withholding approval of this collection at this time. This OMB action is not an approval to conduct or sponsor an information collection under the Paperwork Reduction Act of 1995. The agency shall examine public comment in response to the Notice of Proposed Rulemaking and will include in the supporting statement of the next ICR, to be submitted to OMB at the final rule stage, a description of how the agency has responded to any public comments on the ICR. This action has no effect on any current approvals.

There has not been any proposed rulemaking since promulgation of the rule in 1989 and no comments have been submitted to the docket since promulgation (comments received on the initial proposed rule were responded to during final rulemaking at 54 FR 37534). Therefore, no action was required by EPA to address the TOC.

## **2. Need for and Use of the Collection**

### **2(a) Need/Authority for the Collection**

The EPA is charged under Section 111 of the Clean Air Act (CAA), as amended, to establish standards of performance for new stationary sources that reflect:

. . . application of the best technological system of continuous emissions reduction which (taking into consideration the cost of achieving such emissions reduction, or any non-air quality health and environmental impact and energy requirements) the Administrator determines has been adequately demonstrated.  
Section 111(a)(1).

The Agency refers to this charge as selecting the best demonstrated technology (BDT). Section 111 also requires that the Administrator review and, if appropriate, revise such standards every eight years.

In addition, section 114(a) states that the Administrator may require any owner/operator subject to any requirement of this Act to:

(A) Establish and maintain such records; (B) make such reports;

(C) install, use, and maintain such monitoring equipment, and use such audit procedures, or methods; (D) sample such emissions (in accordance with such procedures or methods, at such locations, at such intervals, during such periods, and in such manner as the Administrator shall prescribe); (E) keep records on control equipment parameters, production variables or other indirect data when direct monitoring of emissions is impractical; (F) submit compliance certifications in accordance with Section 114(a)(3); and (G) provide such other information as the Administrator may reasonably require.

In the Administrator's judgment, volatile organic compound (VOC) emissions from polymeric coating of supporting substrates facilities either cause or contribute to air pollution that may reasonably be anticipated to endanger public health and/or welfare. Therefore, the NSPS were promulgated for this source category at 40 CFR Part 60, Subpart VVV.

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

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 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 and that these standards is being met. The performance test may also be observed.

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

### **3. Non-duplication, Consultations, and Other Collection Criteria**

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

#### **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 (82 FR 29552) on June 29, 2017. 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 association(s) and other interested parties were provided an opportunity to comment on the burden associated with these standards as they were being developed and these same standards have been reviewed previously to determine the minimum information needed for compliance purposes. In developing this ICR, we contacted both the Cytec Solvay Group, at (973) 357-3193, and the Morbern, Inc., at (613) 932-8811.

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.

### **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/operators of polymeric coating of supporting substrates facilities. 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 table below:

<b>Standard (40 CFR Part 60, Subpart VVV)</b>	<b>SIC Codes</b>	<b>NAICS Codes</b>
Narrow Fabric Mills and Schiffli Machine Embroidery	2241	313220
Fabric Coating Mills	2295, 3069	313320
Rope, Cordage, Twine, Tire Cord, and Tire Fabric Mills	2296	314994
Textile Bag and Canvas Mills	2394, 3069	314910
Other Cut and Sew Apparel Manufacturing	3069	315280
Apparel Accessories and Other Apparel Manufacturing	3069	315990
All Other Plastics Product Manufacturing	3069	326199
Rubber and Plastics Hoses and Belting Manufacturing	3052	326220
All Other Rubber Product Manufacturing	3069	326299
Surgical Appliance and Supplies Manufacturing	3069	339113
Sporting and Athletic Goods Manufacturing	3069	339920
Doll, Toy, and Game Manufacturing	3069	339930
Gaskets, Packing, and Sealing Device Manufacturing	3053	339991

**4(b) Information Requested****(i) Data Items**

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

A source must make the following reports:

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

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

A source must keep the following records:

<b>Recordkeeping</b>	
Maintain records of startups, shutdowns, malfunctions, or periods where the continuous monitoring system is inoperative	60.7(b)
Records for performance test measurements	60.8(c)
Record projected VOC use and actual 12-month VOC use, operating parameters (e.g., concentration level of organic compounds, periods of actual coating operations, system efficiency, average combustion temperature, gas temperature before and after the catalytic bed) of the control device (e.g., carbon absorption system, thermal incinerator, and	60.747(c)(1), 60.747(d)

<b>Recordkeeping</b>	
catalytic incinerator); and other parameters, depending on the compliance method being used	
Maintain records for sources with continuous monitoring systems	60.7(f)
Retain records for two years	60.747(h)

### Electronic Reporting

Some of the respondents are using monitoring equipment that automatically records parameter data. Although personnel at the affected facility must still evaluate the data, internal automation has significantly reduced the burden associated with monitoring and recordkeeping at a plant site.

### **(ii) Respondent Activities**

<b>Respondent Activities</b>
Familiarization with the regulatory requirements.
Install, calibrate, maintain, and operate monitoring devices to monitor concentration levels of organic compounds, combustion temperature, gas temperature, or other values of the chosen parameter, depending on the control device used.
Monitor projected and actual VOC use.
Perform initial performance tests, Reference Method 1, 1A, 2, 2A, 2C, 2D, 3, 4, 18, 24, 25, and 25A tests, and repeat performance tests if necessary.
Write the notifications and reports listed above.
Enter information required to be recorded above.
Submit the required reports developing, acquiring, installing, and utilizing technology and systems for the purpose of collecting, validating, and verifying information.
Develop, acquire, install, and utilize technology and systems for the purpose of processing and maintaining information.
Develop, acquire, install, and utilize technology and systems for the purpose of disclosing and providing information.
Train personnel to be able to respond to a collection of information.
Transmit, or otherwise disclose the information.

## 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>
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) 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 quarterly and semiannual reports are used for problem identification, as a check on source operation and maintenance, and for compliance determinations.

Information contained in the reports is 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 two years.

### 5(c) Small Entity Flexibility

There is a distribution of small and large business affected by these standards. The impact



on small entities (i.e., small businesses) was taken into consideration during the development of the regulation. Any affected facility that uses less than 95 Mg VOC per 12-month period is subject only to the requirements of Sections 60.744(b), 60.747(b) and 60.747(c) of these standards, which require reports and records of VOC use. This reduces regulatory requirements for smaller facilities.

According to EPA's *Polymeric Coating of Supporting Substrates – Background Information for Proposed Standards* (May 1985), approximately 55 percent of plants applying polymeric coatings to supporting substrates are small businesses according to employment-size criteria established by the U.S. Small Business Administration. Applying this percentage to the estimated number of respondents affected by this rule, approximately 34 respondents are small entities.

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

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

The specific frequency for each information collection activity within this request is shown below in Table 1: Annual Respondent Burden and Cost – NSPS for Polymeric Coating of Supporting Substrates Facilities (40 CFR Part 60, Subpart VVV) (Renewal).

### **6. 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 neither conduct nor 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 14,200 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 NSPS program, the previously-approved ICR, and any comments received.

#### **6(b) Estimating Respondent Costs**

**(i) Estimating Labor Costs**

This ICR uses the following labor rates:

Managerial	\$144.33 (\$68.73+ 110%)
Technical	\$108.28 (\$51.56 + 110%)
Clerical	\$53.34 (\$25.40 + 110%)

These rates are from the United States Department of Labor, Bureau of Labor Statistics, September 2016, "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 monitor(s) and other costs such as photocopying and postage.

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

<b>Capital/Startup vs. Operation and Maintenance (O&amp;M) Costs</b>						
(A) Continuous Monitoring Device	(B) Capital/Startup Cost for One Respondent	(C) Number of New Respondents	(D) Total Capital/Startup Cost, (B X C)	(E) Annual O&M Costs for One Respondent	(F) Number of Respondents with O&M	(G) Total O&M, (E X F)
VOC Monitor	\$40,000	1	\$40,000	\$8,500	62	\$527,000
Temperature Monitor	\$8,500	1	\$8,500	\$2,000	62	\$124,000
<b>Total</b>			<b>\$48,500</b>			<b>\$651,000</b>

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 \$48,500. This is the total of column D in the above table.

The total operation and maintenance (O&M) costs for this ICR are \$651,000. 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 \$700,000. 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 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 \$36,100.

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

Managerial	\$64.80 (GS-13, Step 5, \$40.50 + 60%)
Technical	\$48.08 (GS-12, Step 1, \$30.05 + 60%)
Clerical	\$26.02 (GS-6, Step 3, \$16.26 + 60%)

These rates are from the Office of Personnel Management (OPM), 2017 General Schedule, which excludes locality rates of pay. The rates have been increased by 60 percent to account for the benefit packages available to government employees. Details upon which this estimate is based appear below in Table 2: Average Annual EPA Burden and Cost – NSPS for Polymeric Coating of Supporting Substrates Facilities (40 CFR Part 60, Subpart VVV) (Renewal).

### 6(d) Estimating the Respondent Universe and Total Burden and Costs

Based on our research for this ICR, on average over the next three years, approximately 61 existing respondents will be subject to these standards. It is estimated that an additional 1 respondent per year will become subject to these same standards. The overall average number of respondents, as shown in the table below, is 62 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 <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)

<b>Number of Respondents</b>					
1	5	60	0	4	61
2	5	61	0	4	62
3	5	62	0	4	63
Average	5	61	0	4	62

<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 62.

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 $E=(B \times C)+D$
Notification of construction/reconstruction	5	1	0	5
Notification of actual startup	5	1	0	5
Notification of initial performance test	5	1	0	5
Notification of VOC use at end of initial year	1	1	0	1
Report of performance test	5	1	0	5
Report of repeat performance test	1	1	0	1
Report of monitoring exceedances and non-compliance periods	12	4	0	48
Report of no excess emissions	50	2	0	100
Report when 1st projected VOC use exceeds cutoff	2	1	0	2
Report when 1st actual 12-month VOC use exceeds cutoff	0	1	0	0
Notification of changes	5	1	0	5
			<b>Total</b>	<b>177</b>

The number of Total Annual Responses is 177. Note that 4 respondents have been double counted in the above table because they have both existing affected facilities and new affected facilities.

The total annual labor costs are \$1,490,000 (rounded). Details regarding these estimates

may be found below in Table 1: Annual Respondent Burden and Cost – NSPS for Polymeric Coating of Supporting Substrates Facilities (40 CFR Part 60, Subpart VVV) (Renewal).

### **6(e) Bottom Line Burden Hours and Cost Tables**

The detailed bottom line burden hours and cost calculations for the respondents and the Agency are shown in Tables 1 and 2 below, respectively, and summarized below.

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

The total annual labor hours are 14,200 hours. Details regarding these estimates may be found below in Table 1: Annual Respondent Burden and Cost – NSPS for Polymeric Coating of Supporting Substrates Facilities (40 CFR Part 60, Subpart VVV) (Renewal).

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 80 hours per response.

The total annual capital/startup and O&M costs to the regulated entity are \$700,000. 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 771 labor hours at a cost of \$36,100; see below in Table 2: Average Annual EPA Burden and Cost – NSPS for Polymeric Coating of Supporting Substrates Facilities (40 CFR Part 60, Subpart VVV) (Renewal).

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 total estimated burden and capital and O&M costs as currently identified in the OMB Inventory of Approved Burdens. This increase is not due to any program changes. The change in the burden and cost estimates occurred due to an increase in the respondent universe. This ICR assumes 1 new facility per year will become subject to these standards.

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

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 80 hours per response. “Burden” means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to a collection of information; search data sources; complete and review the collection of information; and transmit or otherwise disclose the information.

An agency may neither conduct nor sponsor, and a person is not required to respond to, a collection of information unless it displays a valid OMB Control Number. The OMB Control Numbers for EPA regulations are listed at 40 CFR Part 9 and 48 CFR Chapter 15.

To comment on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques, EPA has established a public docket for this ICR under Docket ID Number EPA-HQ-OECA-2014-0043. An electronic version of the public docket is available at <http://www.regulations.gov/>, which may be used to obtain a copy of the draft collection of information, submit or view public comments, access the index listing of the contents of the docket, and to access those documents in the public docket that are available electronically. When in the system, select “search,” then key in the docket ID number identified in this document. The documents are also available for public viewing at the Enforcement and Compliance Docket and Information Center in the EPA Docket Center (EPA/DC), 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-2014-0043 and OMB Control Number 2060-0181 in any correspondence.

### **Part B of the Supporting Statement**

This part is not applicable because no statistical methods were used in collecting this information.

**Table 1: Annual Respondent Burden and Cost – NSPS for Polymeric Coating of Supporting Substrates Facilities (40 CFR Part 60, Subpart VVV) (Renewal)**

Burden Item	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)
	Technical person-hours per occurrence	No. of occurrences per respondent per year	Technical person-hours per respondent per year (C=AxB)	Respondents per year <sup>a</sup>	Technical hours per year (E=CxD)	Management hours per year (F=Ex0.05)	Clerical hours per year (G=Ex0.10)	Total cost per year (\$) <sup>b</sup>
1. Applications	N/A							
2. Surveys and studies	N/A							
3. Reporting requirements								
A. Familiarize with the regulatory requirements <sup>c</sup>	1	1	1	62	62	3.1	6.2	\$7,491.49
B. Required activities								
Initial performance test	280	1	280	5	1,400	70	140	\$169,162.70
Repeat performance test <sup>d</sup>	280	1	280	1	280	14	28	\$33,832.54
Monthly compliance test <sup>e</sup>	90	12	1080	1	1,080	54	108	\$130,496.94
C. Create information	See 3B							
D. Gather existing information	See 3E							
E. Write report								
Notification of construction/reconstruction	2	1	2	5	10	0.5	1	\$1,208.31
Notification of actual startup	2	1	2	5	10	0.5	1	\$1,208.31
Notification of initial performance test	2	1	2	5	10	0.5	1	\$1,208.31
Notification of VOC use at end of initial year <sup>f</sup>	2	1	2	1	2	0.1	0.2	\$241.66
Report of performance test	See 3B							
Report of monitoring	16	4	64	12	768	38.4	76.8	\$92,797.82

exceedances and non-compliance periods <sup>g</sup>								
Report of no excess emissions <sup>h</sup>	8	2	16	50	800	40	80	\$96,664.40
Report when 1st projected VOC use exceeds cutoff	2	1	2	2	4	0.2	0.4	\$483.32
Report when 1st actual 12-month VOC use exceeds cutoff <sup>i</sup>	2	1	2	0	0	0	0	\$0
Notification of changes <sup>j</sup>	4	1	4	5	20	1	2	\$2,416.61
<b>Subtotal for Reporting Requirements</b>						<b>5,113</b>		<b>\$537,212</b>
4. Recordkeeping requirements								
A. Read instructions	See 3A							
B. Plan activities	See 3B							
C. Implement activities	See 3B							
D. Develop record system	N/A							
E. Time to enter information								
Records of startups, shutdowns, malfunctions, etc. <sup>k</sup>	1.5	25	37.5	62	2325	116.25	232.5	\$280,930.91
Records of operating parameters <sup>l</sup>	0.25	350	87.5	62	5,425.00	271.25	542.5	\$655,505.46
Records of semiannual projected VOC use estimate <sup>m</sup>	1	2	2	12	24	1.2	2.4	\$2,899.93
Records of 12-month actual VOC use <sup>m</sup>	1	12	12	12	144	7.2	14.4	\$17,399.59
F. Train personnel	N/A							
G. Audits	N/A							
<b>Subtotal for Recordkeeping Requirements</b>						<b>9,106</b>		<b>\$956,736</b>
<b>TOTAL ANNUAL BURDEN AND COST (rounded) <sup>n</sup></b>						<b>14,200</b>		<b>\$1,490,000</b>
<b>TOTAL CAPITAL AND O&amp;M COST (rounded) <sup>n</sup></b>								<b>\$700,000</b>
<b>GRAND TOTAL (rounded) <sup>n</sup></b>								<b>\$2,190,000</b>



**Assumptions:**

- <sup>a</sup> On average, EPA estimates 58 existing plants and 1 new plant per year will be subject to the NSPS over the next 3 years. This ICR assumes 4 existing plants per year will install new coating lines.
- <sup>b</sup> This ICR uses the following labor rates: \$108.28 (technical), \$144.33 (managerial), and \$53.34 (clerical). These rates are from the United States Department of Labor, Bureau of Labor Statistics, September 2016, "Table 2. Civilian workers, by occupational and industry group." The rates are from column 1, "Total compensation." They have been increased by 110 percent to account for the benefit packages available to those employed by private industry.
- <sup>c</sup> This ICR assumes all respondents will have to familiarize with the regulatory requirements each year.
- <sup>d</sup> This ICR assumes 20 percent of initial performance tests must be repeated due to failure ( $5 \times 20\% = 1$ ).
- <sup>e</sup> This ICR assumes one coating line per year will demonstrate compliance by the liquid material balance method, which requires monthly compliance testing.
- <sup>f</sup> This ICR assumes one plant per year will be required to submit this notification.
- <sup>g</sup> This ICR assumes 20 percent of existing and new plants will report monitoring exceedances or non-compliance periods on a quarterly basis ( $62 \times 20\% = 12$ , after rounding). These plants will comply through either the emission reduction, alternative, or coating mix preparation equipment standards.
- <sup>h</sup> This ICR assumes 80 percent of existing and new plants will report no excess emissions ( $62 \times 80\% = 50$ , after rounding).
- <sup>i</sup> This ICR assumes no coating lines at any existing or new plants will exceed the cutoff value.
- <sup>j</sup> This burden applies to new plants and existing plants that modify or reconstruct coating operations or coating mix preparation equipment. Per footnote a, EPA estimates 1 new plant per year and 4 existing plants with new coating lines per year.
- <sup>k</sup> This ICR assumes there will be one malfunction or shutdown every 2 weeks over 50 weeks per year, or 25 occurrences per year ( $50/2 = 25$ ).
- <sup>l</sup> This ICR assumes operating parameters will be recorded over 350 days per year.
- <sup>m</sup> This assumes 20 percent of existing and new plants will record VOC use estimates ( $62 \times 20\% = 12$ , after rounding).
- <sup>n</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 – NSPS for Polymeric Coating of Supporting Substrates Facilities (40 CFR Part 60, Subpart VVV) (Renewal)**

Burden Item	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)
	Technical person-hours per occurrence	No. of occurrences per respondent per year	Technical person-hours per respondent per year (C=AxB)	Respondents per year <sup>a</sup>	Technical hours per year (E=CxD)	Management hours per year (F=Ex0.05)	Clerical hours per year (G=Ex0.10)	Total cost per year (\$) <sup>b</sup>
New facilities								
Notification of construction/reconstruction	2	1	2	5	10	0.5	1	\$539.22
Notification of actual startup	2	1	2	5	10	0.5	1	\$539.22
Notification of initial performance test	2	1	2	5	10	0.5	1	\$539.22
Notification of VOC use at end of initial year	2	1	2	1	2	0.1	0.2	\$107.84
Performance test results	8	1	8	5	40	2	4	\$2,156.88
New and existing facilities								
Report of monitoring exceedances and non-compliance periods <sup>c</sup>	8	4	32	12	384	19.2	38.4	\$20,706.05
Report of no excess emissions <sup>d</sup>	2	2	4	50	200	10	20	\$10,784.40
Report when 1st projected VOC use exceeds cutoff	2	1	2	2	4	0.2	0.4	\$215.69
Report when 1st actual 12-month VOC use exceeds cutoff <sup>e</sup>	2	1	2	0	0	0	0	\$0
Notification of changes <sup>f</sup>	2	1	2	5	10	0.5	1	\$539.22
<b>TOTAL ANNUAL BURDEN AND COST (ROUNDED) <sup>g</sup></b>						<b>771</b>		<b>\$36,100</b>

**Assumptions:**

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

<sup>b</sup> This ICR uses the following labor rates: \$48.08 (technical), \$64.80 (managerial), and \$26.02 (clerical). These rates are from the Office of Personnel Management (OPM), 2017 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.

<sup>c</sup> This ICR assumes 20 percent of existing and new plants will report monitoring exceedances or non-compliance periods on a quarterly basis ( $62 \times 20\% = 12$ , after rounding). These plants will comply through either the emission reduction, alternative, or coating mix preparation equipment standards.

<sup>d</sup> This ICR assumes 80 percent of existing and new plants will report no excess emissions ( $62 \times 80\% = 50$ , after rounding).

<sup>e</sup> This ICR assumes no coating lines at any existing or new plants will exceed the cutoff value.

<sup>f</sup> This burden applies to new plants and existing plants that modify or reconstruct coating operations or coating mix preparation equipment. Per footnote a, EPA estimates 1 new plant per year and 4 existing plants with new coating lines per year.

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